




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 404058352	Sedex Site Reference: (only available on Sedex System)	ZS: 404125367	
Business name (Company name):	WUYI PHOENIX HOUSEHOLD UTENSILS CO., LTD			
Site name:	WUYI PHOENIX HOUSEHOLD UTENSILS CO., LTD 武义县凤凰日用品有限公司			
Site address: (Please include full address)	No. 16, Century Road, Wangshantou Industrial Zone, Quanxi Town, Wuyi County, Jinhua City, Zhejiang Province, China 浙江省金华市武义县泉溪 镇王山头工业区世纪路 16 号	Country:	China	
Site contact and job title:	Mr. Zhou Yong / HR Manager			
Site phone:	86-13735730565	Site e-mail:	231431701@qq.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	23 March 2023 / 17 April 2023 (Note: This is an offline desktop review, neither an initial audit nor full/ partial follow up audit.)			

Audit Company Name & Logo: Bureau Veritas Consumer Products Services 	Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload) JINHUA GENERAL STANDARD TRADING CO LTD
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): 1. This audit was carried out for the site directly and no retailer/brand was mentioned as a master client. So the section on unauthorised subcontracting was reviewed with a general sampling of the site's clients but no review against a policy in any retailer/brand auditing Service Level Agreement. 2. This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Nigel Guo (CSCA21701222) / NA

Team auditor: Gatsby Zhang (CSCA21703606) / NA

Interviewers: Nigel Guo (CSCA21701222), Gatsby Zhang (CSCA21703606) / NA

Report writer: Nigel Guo (CSCA21701222) / Danli Wu

Report reviewer: Hannah Mei

Date of declaration: March 23, 2023

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 / NA Day 1 Time out: 17:00 / NA	Day 2 Time in: Nil Day 2 Time out: Nil	Day 3 Time in: Nil Day 3 Time out: Nil
B: Number of auditor days used:	1.5 Man-Day (2 auditors x 1 day) / NA		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define: Offline Desktop Verification		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 2 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Zhou Yong / HR Manager		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	28 March 2022		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker Committee representatives was present in facility.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	N/A. No union representative was available in facility.		

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/ Closed or comment</i>
Safety and Hygienic Conditions No.1	Carried Over	根据现场走访，审核员发现全厂约 20% 的危险化学品（如：油漆、油墨、稀释剂等）容器没有张贴安全标签。 Per onsite observation, it was noted that approximately 20% hazardous chemical (such as paint, printing ink, thinner, and etc.) containers being used in the facility were not posted with safety labels.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	建议所有在企业内储存和使用的危险化学品都有张贴安全标签，标签的内容要完整。 It is recommended that all hazardous chemicals stored or being used in the facility should be posted with safety labels.	30 Days	Desktop	Yes, Mr. Zhou Yong / HR Manager	2023 年 4 月 12 日桌面审查结果：接受。 根据提供的文件，注意到化学品已经张贴了安全标签，工厂也提供了相关的培训记录。 Desktop review result on Apr 12, 2023: Accepted. According to the documents provided, it was noted that the chemicals had been posted with safety labels and the factory had provided relevant training records.	Closed
Safety and Hygienic Conditions No.2	New	根据现场走访，审核员发现全厂约 20% 的化学品（如：油漆、油墨、稀释剂等）没有设置防渗漏设施/二次容器。 Per onsite observation, it was noted that there was no anti-leakage facility (e.g. secondary container) in the facility storage for	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please	建议企业为存放在企业的化学品设置防渗漏设施/二次容器。 It is recommended that the anti-leakage facility (e.g. secondary	30 Days	Desktop	Yes, Mr. Zhou Yong / HR Manager	2023 年 4 月 12 日桌面审查结果：接受。 根据所提供的文件，注意到化学品已配备了二次容器，工厂也提供了相关的培训记录。	Closed

		approximately 20% of hazardous chemicals (such as paint, printing ink, thinner, and etc.).	give details:	container) should be used for chemicals.				Desktop review result on Apr 12, 2023: Accepted. According to the documents provided, it was noted that the chemicals had been equipped with secondary containers and that the factory had provided relevant training records.	
Safety and Hygienic Conditions No.3	New	根据现场走访，审核员发现金工车间 22 台冲压机有 3 台没有安装踏板保护装置。 Per onsite observation, it was noted that 3 out of 22 punching machines in the metal-working workshop were not equipped with safety devices.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	建议企业为所有的冲压机正确安装踏板保护装置。 It is recommended that all sewing machines should be equipped with safety device.	30 Days	Desktop	Yes, Mr. Zhou Yong / HR Manager	2023 年 4 月 10 日桌面审查结果: 接受。 根据提供的照片，注意到冲压机已经安装了踏板保护装置。 Desktop review result on Apr 10, 2023: Accepted. According to the photos provided, it was noted that safety devices were installed on the punching machines.	Closed
Safety and Hygienic Conditions No.4	Carried Over	根据现场走访，审核员发现企业有为员工免费提供个人劳保用品（如耳塞、防尘口罩、护目镜、橡胶手套等），但抛光车间 16 名员工中的 2 名工作时没有佩戴企业提供的耳塞、护目镜和防尘口罩。喷漆车间 6 名员工的 2 名工作时没有佩戴企业提供的橡胶手套。 Per onsite observation, it was noted that it was noted that the facility had provided the personal protective equipment such as earplugs, anti-dust masks, goggles and rubber gloves to its worker. However, 2 out of 16 workers in the polishing workshop did not use earplugs, anti-dust masks, goggles properly and 2 out of 6 workers in the painting workshop did not use	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	建议企业为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。 It is recommended that necessary personal protective equipment should be provided for relevant employees and measures should be taken to ensure that employees use such personal protective equipment appropriately.	30 Days	Desktop	Yes, Mr. Zhou Yong / HR Manager	2023 年 4 月 12 日桌面审查结果: 接受。 根据提供的文件，注意到员工使用了适当的个人防护用品，工厂也提供了相关的培训记录。 Desktop review result on Apr 12, 2023: Accepted. According to the documents provided, it was noted that the employees used appropriate PPE and the factory provided relevant training records.	Closed

		rubber gloves properly while working time.							
Safety and Hygienic Conditions No.5	Carried Over	<p>根据现场走访，审核员发现包装车间 21 个电箱中的 3 个旁边堆放了物料和杂物。</p> <p>Per onsite observation, it was noted that there were production materials and sundries laid beside 3 out of 21 electric boxes in the packing workshop.</p>	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>建议企业确保包装车间内所有电箱都不被阻挡，应留有足够的安全通道和工作空间且不应堆放易燃、易爆和腐蚀性物品。</p> <p>It is recommended that all electric boxes in the metal processing workshop should be free of obstruction and no flammable, explosive or corrosive material is allowed to store near the electric installation.</p>	30 Days	Desktop	Yes, Mr. Zhou Yong / HR Manager	<p>2023 年 4 月 12 日桌面审查结果: 接受。</p> <p>根据提供的照片，注意到堆放在电箱旁边的物料和杂物已清理完毕，工厂还提供了电箱的定期安全检查和记录。</p> <p>Desktop review result on Apr 12, 2023: Accepted.</p> <p>According to the documents provided, it was noted that the production materials and sundries laid beside the electric boxes had been cleared and regular safety inspection and maintenance records of the electric boxes were provided by the factory.</p>	Closed
Working Hours No.1	Carried Over	<p>审核员从企业提供的工资工时记录中共抽取30个样本(其中从2022年08月抽取10个，从2022年12月抽取10个，从最近发薪2023年01月抽取10个)，发现共有19名员工加班时间超出了法定标准，具体为：</p> <ul style="list-style-type: none"> •9/10名员工在2022年08月的加班时间为50小时，超过每月加班时间不能超过36小时的规定； •10/10名员工在2022年12月的加班时间为56小时，超过每月加班时间不能超过36小时的规定。 <p>Based on review of 30 sample population employees' attendance records (10 sample from August 2022, 10 samples from December 2022, 10 samples from current payment month January</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>建议企业确保员工的加班时间符合法律要求。</p> <p>It is recommended that factory management adopt practices and controls to ensure that employees' overtime hours do not exceed the statutory limits.</p>	60 Days	Follow-Up	Yes, Mr. Zhou Yong / HR Manager	<p>2023 年 4 月 17 日桌面审查结果: 此问题点无法通过桌面审核进行验证，需要进行后续审核。</p> <p>Desktop review result on Apr 17, 2023: This finding cannot be verified by desktop verification, follow-up audit is required.</p>	Open

		<p>2023), it was noted that 19 out of 30 sample population employees worked in excess of the statutory overtime hour limits, yielded the following:</p> <ul style="list-style-type: none"> •9 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 50 hours) in August 2022, which was not in compliance with the legal requirement; •10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 56 hours) in December 2022, which was not in compliance with the legal requirement. 							
Wages and Benefits No.1	Carried Over	<p>审核员发现企业的社会保险覆盖不足。根据厂方提供的 2023 年 02 月社会保险缴费单据显示工厂 98 名员工中的 48 名员工提供了养老、医疗、失业、生育保险(比例为 48.98%), 为所有 98 名员工提供了工伤保险(比例为 100%)。It was noted that the facility's social insurance coverage was insufficient. By review of the social insurance payment receipt provided by facility management, it was noted that 48 out of 98 employees (48.98%) were provided with pension, medical, unemployment, maternity insurance, and all 98 employees (100%) were provided with accident insurance in February 2023.</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>建议企业为员工提供所有法定的社会保险福利。</p> <p>It is recommended that management adopt practices and controls to ensure that all employees are provided with social insurance benefit as legally required.</p>	60 Days	Follow-Up	Yes, Mr. Zhou Yong / HR Manager	<p>2023 年 4 月 17 日桌面审查结果: 此问题点无法通过桌面审核进行验证, 需要进行后续审核。</p> <p>Desktop review result on Apr 17, 2023: This finding cannot be verified by desktop verification, follow-up audit is required.</p>	Open

Corrective Action Plan – Observations				
Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
Nil	Nil	Nil	Nil	Nil

Good examples		
Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
Nil	Nil	Nil

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i>		
A: Site Representative Signature:	Mr. Zhou Yong	Title: HR Manager Date: March 23, 2023
B: Auditor Signature:	Nigel Guo, Gatsby Zhang	Title: Auditors Date: March 23, 2023
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances:		
E: Signed: <i>(If <u>any</u> entry in box D, please complete a signature on this line)</i>		Title Date
F: Any other site Comments:		

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a “root cause”

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

<https://www.surveymonkey.co.uk/r/BRTVCKP>