

Monitored Party SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD	amfori ID 156-024494-000	Address 301, 99-1 Dayang Road, Xintian Community, Fuhai Street, Baoan District, 518103 Shenzhen, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 20/11/2024	Closing Meeting Finished Date 23/11/2024	Submission Date 01/12/2024
Expiration Date 01/12/2025	Announcement Type Semi Announced	
Site SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD	Site amfori ID 156-024494-002	

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OVERALL RATING



SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	A	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	B	

PA 6: Decent Working Hours	D	
PA 7: Occupational Health and Safety	A	
PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Ted Zhang; APSCA membership number: CSCA 21701883

Monitoring partner name: TUV Rheinland.

Audit schedule details: The audit was planned for 1 auditor x 2.5 man-days.

Announcement Type: Semi Announced.

Business partner information: The auditee was established in year of 2013 and located at 301, 99-1 Dayang Road, Xintian Community, Fuhai Street, Baoan District, Shenzhen, Guangdong, China (中国广东省深圳市宝安区福海街道新田社区大洋路99-1号301) as per its business license. The auditee mainly manufactured the Charger, power adapter, open frame power supply board. The main production processes were DIP, assembly, aging, inspection, and packing. As per management team, there was no obvious peak or low season in the past one year, and no production process was subcontracted.

Audited location information: The auditee was located in an industrial park, there were 9 blocks of production buildings in this boundary and there were about 20 independent companies inside. It was verified that the auditee only rented and used the whole 1F to 3F of the 4-storey production building No. 99-1 with 3660 square meters of the construction area.

Floor information of the production building No. 99-1 as below:

1F: used by the auditee as materials and finished products warehouses.

2F: used by the auditee as office area and aging, inspection, and packing workshops.

3F: used by the auditee as office area, DIP and assembly workshop.

4F: used by one independent photoelectricity company with separate business license and out of scope.

There was physical isolation to separate between the auditee and other companies in this industrial park. No evidence was collected to show that the auditee had shared management team, stakeholders, workers, or production process with other companies in the boundary. No transportation, kitchen, canteen, or dormitory was provided to workers of the auditee. Therefore, this audit scope was including 1F to 3F of the 4-storey production building No. 99-1 only. In previous audit in November 2023, the auditee's site only including 3F of the 4-storey production building No. 99-1. As per management team, their business was increased so that they expanded to rent 1F and 2F of the 4-storey production building No. 99-1 since April 2024. The auditee provided one address certificate issued by local community to show that the auditee's actual site was including 101, 201, and 301 (total 3 floors) of No. 99-1. The management confirmed that the English Address used in this report/amfori platform should be "301, 99-1 Dayang Road, Xintian Community, Fuhai Street, Baoan District, Shenzhen, Guangdong, China" in accordance with the address of its business license.

Operating shifts and hours: During this audit, total 20 sampled workers' time records from 1 November 2023 to the morning on 20 November 2024 of the current first audit day were provided for review. Workers' attendance information was recorded at the beginning and end of each working shift. Standard working hour system was implemented. Regular working time was 8 hours per day and 5 days per week. All workers worked in one shift per day. All workers' regular working hours were from 08:00 to 12:00, and from 13:30 to 17:30; overtime was 2 hours from 18:00 to 20:00. The overtime frequency was 1 to 5 times per week depending on production need; their overtime hours on Saturdays were 8 hours regularly. Sunday was guaranteed as the rest day for all workers. It was noted that the maximum daily and monthly overtime hours were 2 hours and 60 hours (August 2024) respectively. In addition, the sampled workers' weekly working hours were maximum 58 hours including 40 regular hours and 18 overtime hours. Workers could ask for leaves freely. Time recording system: The face scanning attendance machine.

Salary payment details: Wage was paid by cash on or before 7th of each month for the previous wage cycle. During this audit, the latest wage calculation cycle was October 2024 with payment day on 7 November 2024. Total 20 workers' payroll records from November 2023 to October 2024 were sampled for review. The local legal minimum wage was adjusted to RMB2360/month (equal to RMB13.57/hour) since 1 January 2022. It was noted that all sampled workers were compensated at the local legal minimum wage standard: they were paid at RMB13.57/hour (equal to RMB2360/month) on basis of the hourly rate in the past one year. 150% and 200% of the regular rate was compensated for overtime on regular working days and rest days respectively. No overtime on national holiday was conducted in the past one year. Workers were compensated with the full attendance bonus (RMB100/month), meal allowance (RMB500/month), and position allowance (at least RMB400/month). Deduction items in the payroll records were only the social insurance fee of worker's own part and personal incoming tax. No illegal deduction was applied for this auditee.

Worker number information: Total 245 workers including 191 production workers (including 76 male and 115 female) and 54 non-production workers were hired directly by the auditee. There were 210 domestic workers (98 male and 112 female) from various provinces such as Guangxi, Henan, Hunan, Sichuan, and Yunnan, etc. No subcontracted labor, dispatched worker, home worker, oversea migrant labor, child labor, juvenile worker, or part-time worker was found during this audit. No security guard was hired by the auditee. The industrial park was responsible for the security issue.

Good practices: Workers were compensated with the full attendance bonus (RMB100/month), meal allowance (RMB500/month), and position allowance (at least RMB400/month).

Worker organization details: No labor union was established. Three worker representatives were freely elected by workers themselves.

Circumstances: There was no special circumstance during the audit.

Summary of findings: during this audit, findings were noted in PA1, PA5, PA6, PA7, and PA12.

PA1: Insufficient social management system and the auditee didn't implement effective workforce capacity planning.

PA5: 20% of sampled workers were paid insufficient remuneration to meet the living wage, insufficient social insurance coverage.

PA6: Systematic excessive monthly OT.

PA7: 6 workers were not provided with the injury insurance, Partial workers did not wear the provided PPE, 4 electrical control panels in the assembly & packing workshop on 2F of the production building were not equipped with inner covers.

PA12: There were no waste air emission outlet signboards for 2 waste air emission outlets.

Attachment:

1) The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit.

2) Agency labour contract was not reviewed as no agency was used. No contractor license/permit was reviewed as no contractor was used during audit period. No collective bargaining agreement was applied.

3) The auditee had not got any government waiver.

SITE DETAILS

Site

SHENZHEN SUNNY SHI JI
TECHNOLOGY CO., LTD

Site amfori ID

156-024494-002

GICS Classification

Sector	Industry Group	Industry
Information Technology	Technology Hardware & Equipment	Electronic Equipment, Instruments & Components
Sub Industry		
Electronic Components		

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	241	Workers
Legal minimum wage in local currency	2,360	Monthly
Lowest wage paid for regular work at the site	2,360	Monthly
Calculated living wage in local currency	3,719	Monthly
Total sample	20	Workers

Other Metrics

Male workers	109	Workers
Female workers	132	Workers
Non-binary workers	0	Workers
Permanent workers - Male	110	Workers
Permanent workers - Female	135	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	6	Workers
Management - Female	3	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	8	Workers
Workers on probation - Female	6	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	98	Workers
Domestic migrant workers - Female	112	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	110	Workers
Workers hired directly - Female	135	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	9	Workers
Sample - Female	11	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD | Site amfori ID: 156-024494-002

Question: 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially respected this principle based on site observation, document review, worker interview and management interview. The auditee had not established an effective management system to fully implement the amfori BSCI code of conduct and laws and regulations. For example, 20% of sampled workers were paid insufficient remuneration to meet the living wage, insufficient social insurance coverage, systematic excessive monthly OT, 6 workers were not provided with the injury insurance, Partial workers did not wear the provided PPE, 4 electrical control panels in the assembly & packing workshop on 2F of the production building were not equipped with inner covers, there were no waste air emission outlet signboards for 2 waste air emission outlets. According to the interview with the management, they were aware of the existence of most of the issues; however, the auditee did not formulate effective improvement measures or plans to achieve gradual improvement or fully correct them. The management explained that some findings were difficult to be fully corrected in a short period of time due to lack of manpower, cost increased, insufficient onsite monitoring on Health and Safety issues, etc. Nevertheless, they promised to make corrective actions on some issues that could be settled within a short period of time. This violated the requirements of amfori BSCI system manual.</p>	<p>基于现场观察、文件审核、工人访谈和管理层访谈，受审核方部分遵守该原则。受审核方没有建立一个有效的管理体系去全面落实amfori BSCI行为守则及法律法规要求。比如20%的抽样工人的报酬不足以满足生活工资，社保覆盖不足，系统性的月加班超时，受审核方没有给6名工人提供工伤保险，部分工人没有佩戴提供的个人防护用品，生产楼2楼组装和包装车间的4个电箱没有安装内盖，2个废气排放口没有废气排放口标识牌。根据管理人员访谈，他们了解所提到的大部分问题的存在，但是并未针对这些问题制定有效的改善措施或计划，来实现逐步改善或者彻底改善。管理人员解释，由于缺少人力、成本增加、现场健康安全问题的监督不足等原因，一些问题很难在短期内解决。尽管如此，他们还是承诺会对一些短期内可以解决的问题尽快完善。这违反了amfori BSCI系统手册中的要求。</p>

Question: 1.4 Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially respected this principle based on document review, worker interview and management interview. The auditee didn't</p>	<p>基于文件审核、工人访谈和管理层访谈，受审核方部分遵守该原则。受审核方未有效执行产能规划导致在抽样审核的20名工人系统性存在月加班超时的</p>

Finding

implement effective workforce capacity planning causing the issue that monthly overtime hours were systematically exceeding the legal requirement for 20 sampled workers. The management explained that due to manpower shortage and urgent production orders, it was hard to reasonably arrange production plan (refer to 6.2 for details). This violated the requirements of amfori BSCI system manual.

问题。管理人员解释由于人员紧缺和紧急的生产订单，很难合理安排生产计划（详见6.2）。这违反了amfori BSCI系统手册中的要求。

PA 5: Fair Remuneration

Site: SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD | Site amfori ID: 156-024494-002

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on document review, worker interview and management interview. 20% of sampled workers were paid insufficient remuneration to meet the living wage. During this audit, it was noted that all sampled workers were compensated at least RMB2360/month of the regular wage which could meet the local legal minimum wage, but 4 out of 20 sampled workers (20%) were paid at RMB3678.94/month, less than RMB3719 of the living wage standard (not including the overtime wage. Calculation published on the GLWC website). The management team said that they had arranged proper overtime for workers, so that they considered that workers' total incomes could support their normal living expenses. This violated the requirements of amfori BSCI system manual.

基于文件审核、员工访谈和管理层访谈，受审核方部分遵守该原则。20%的抽样工人的报酬不足以满足生活工资。本次审核发现给所有抽样工人支付的基本工资至少为2360元/月，符合当地最低工资，但支付给4/20名抽样工人（20%）为3678.94元，低于生活工资的标准3719元（不包括加班费。来自GLWC网站上的统计数据）。管理层说他们每个月都有安排适当的加班，因此他们认为工人的总收入可以维持他们正常的生活开支。这违反了amfori BSCI系统手册中的要求。

Question: 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on document review, worker interview and management interview. There were 245 workers

基于文件审核、员工访谈和管理层访谈，受审核方部分遵守该原则。受审核方雇佣了245名工人包括有1名退休返聘工人（根据当地法律，退休返聘工人不

Finding

hired by the auditee including 1 retirement re-employment worker (no social insurances were mandatory for the retirement re-employment worker as per local law) and 14 new workers within one month of on-boarding. Therefore, 230 workers should be entitled to the social insurances as per legal requirements. The online social insurance purchasing system in the past one year were provided for review. In October 2024, only 224 workers were provided with the work-related injury, unemployment, medical and child-bearing insurances; only 218 workers were provided with the retirement insurance. Therefore, other 6 workers were not provided with the work-related injury, unemployment, medical and child-bearing insurances; other 12 workers were not provided with the retirement insurance.

Both the management team and interviewed workers said that workers had social insurances or the new Rural Cooperative Medical Insurance in their hometowns, so that they did not want to have social insurances in the auditee. However, the auditee did not collect any evidence about those workers' payment of the social insurances or the new Rural Cooperative Medical Insurance in their hometowns. This violated PRC Labor Act, Article 72 and Article 73.

Remark: The auditee did not have any subcontracted worker, dispatched worker, temporary worker, home worker, part-time worker or student worker. 1 retirement re-employment worker had participating in the special personnel work-related injury insurance.

强制要求购买社会保险；以及14名入职未满1个月的新工人。因此，根据法律要求230名工人应当享受社会保险。受审核方提供了过去一年的社保网上缴费系统供查看。在2024年10月，受审核方只给224名工人提供了工伤、失业、医疗、生育保险；只给218名工人提供了养老保险。因此，受审核方没有给其他6名工人提供工伤、失业、医疗、生育保险；没有给其他12名工人提供养老保险。

管理层和接受访谈的工人说工人已经在自己的家乡参加了社保或者新农村合作医疗保险。所以他们不选择在受审核方参保。但是，受审核方没有收集工人在自己家乡购买社保或者新农村合作医疗保险的付款证据。这违反了中国劳动法第72条和73条。

备注:受审核方没有外包工、劳务派遣工、临时工、家庭工、兼职工或学生工。1名退休返聘工人参加了特定人员工伤保险。

PA 6: Decent Working Hours

Site: SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD | Site amfori ID: 156-024494-002

Question: 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee did not respect this principle based on document review, worker interview and management interview. It was noted that all sampled workers' monthly overtime hours were systematically exceeding 36 hours during this audit.

基于文件审核、工人访谈和管理层访谈，受审核方未遵守该原则。本次审核所有抽样工人的月加班时间系统性超过36小时。受审核方提供了总共20名抽样工人从2023年11月1日到2024年11月20日当前审核第一日的考勤记录供查看。发现这20名抽样工人

Finding

Total 20 sampled workers' time records from 1 November 2023 to 20 November 2024 of the current first audit day were provided for review. It was noted that these 20 sampled workers' monthly overtime hours in months of from November 2023 to October 2024 were exceeding 36 hours of the legal limit. The time records in January 2024, August 2024, and October 2024 were used as the calculation samples. It was noted that:

- 20 out of 20 sampled workers' monthly overtime hours in January 2024 were exceeding 36 hours, maximum 58 hours;
- 20 out of 20 sampled workers' monthly overtime hours in August 2024 were exceeding 36 hours, maximum 60 hours;
- 20 out of 20 sampled workers' monthly overtime hours in October 2024 were exceeding 36 hours, maximum 58 hours.

The management representative stated that the production capacity was based on order planning, work force, and machinery, etc., but they were still difficult to control monthly overtime within 36 hours currently. Currently they could control workers' monthly overtime within 60 hours, and the weekly working hours within 60 hours.

Interviewed workers reported that their monthly overtime hours were exceeding 36 hours in each month. Overtime was conducted at their own willing. They were willing to have appropriate overtime, and they did not have any complaint about the overtime hours. This violated PRC Labor Act, Article 41 (The auditee did not obtain any valid comprehensive working hours system waiver).

从2023年11月到2024年10月的月加班时间超过法律规定的36小时。选取2024年1月、2024年8月和2024年10月总共三个月的考勤记录作为统计样本，发现：

- 20/20名抽样工人在2024年1月的月加班超过36小时，最高58小时；
- 20/20名抽样工人在2024年8月的月加班超过36小时，最高60小时；
- 20/20名抽样工人在2024年10月的月加班超过36小时，最高58小时。

管理者代表表示生产产能都是基于订单安排、劳动力和机器等情况来确定的，但是他们目前依然很难控制月加班在36小时以内。目前他们控制工人的月加班时间在60小时以内，且周工作时间在60小时以内。受访工人表示每个月的月加班时间超过36个小时。加班是自愿的，他们愿意有适当的加班，目前他们对加班时间没有抱怨。这违反了中华人民共和国劳动法第41条(受审核方没有取得任何有效的综合计时批文)。

PA 7: Occupational Health and Safety

Site: SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD | Site amfori ID: 156-024494-002

Question: 7.2 Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on document review, worker interview and management interview. It was noted that 6 out of 245 workers were not provided with the injury insurance. (Remark: As per the social insurances

基于文件审核、工人访谈和管理层访谈，受审核方部分遵守该原则。受审核方没有给6/245名工人提供工伤保险（备注：根据提供的社保缴纳系统，受审核方在2024年10月只给225名工人提供了工伤保险，另外有14名入职未满1个月的新工人）。这违反

Finding	
purchasing system, only 225 workers were provided with the work-related injury insurance in October 2024, and there were 14 new workers within one month of on-boarding). This violated Social Insurance Law of the People's Republic of China, Article 33.	了中华人民共和国社会保险法第33条。

Question: 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH	LOCAL LANGUAGE
Finding	
The auditee partially respected this principle based on site observation, worker interview and management interview. Partial workers did not wear the provided PPE. For example, It was noted that 4 workers contacting with the cleaning detergent in the assembly lines were only wearing the disposal sanitary masks instead of the carbon activated protective masks, 3 workers contacting with glue in the assembly lines were not wearing the provided the protective gloves. The management team said that this was due to insufficient onsite monitoring. Interviewed workers reported that partial workers did not use the protective gloves due to inconvenient operation. This violated Production Safety Law of the People's Republic of China, Article 45.	基于现场观察、工人访谈和管理层访谈，受审核方部分遵守该原则。部分工人没有佩戴提供的个人防护用品。比如，组装线上4名接触抹机水的工人只佩戴了一次性卫生口罩而不是活性炭防护口罩，组装线上3名接触胶水的工人没有佩戴提供的防护手套。管理层说这是由于现场监管不足。接受访谈的工人确认部分工人没有佩戴手套是由于不方便操作。这违反了中华人民共和国安全生产法第45条。

Question: 7.13 Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?

ENGLISH	LOCAL LANGUAGE
Finding	
The auditee partially respected this principle based on site observation, worker interview and management interview. It was noted that 4 electrical control panels in the assembly & packing workshop on 2F of the production building were not equipped with inner covers which led to these electrical switches exposed, but workers need operate these electrical switches directly. The management team said that they were aware of this risk and working with the electrician to take correction for this issue. Interviewed workers	基于现场观察、工人访谈和管理层访谈，受审核方部分遵守该原则。生产楼2楼组装和包装车间的4个电箱没有安装内盖，导致这些电源开关裸露，但是工人需要直接操作这些开关。管理层说他们了解这个风险，正在和电工沟通改善这个问题。接受访谈的工人说部分电箱没有安装内盖。这违反了低压配电设计规范第5.1.1条。

Finding

reported that partial electrical control panels were not equipped with inner covers. This violated Code for Design Of low Voltage Electrical Installations, Article 5.1.1.

PA 12: Protection of the Environment

Site: SHENZHEN SUNNY SHI JI TECHNOLOGY CO., LTD | Site amfori ID: 156-024494-002

Question: 12.4 Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on site observation and management interview. There were no waste air emission outlet signboards for 2 waste air emission outlets which were located on the roof of production building. The management team said that the signboards were broken, and they were in the process of purchasing the new ones. This violated Technical Requirements for Standardized Regulation of Sewage Outfall, Article 4.1.

基于现场观察和管理层访谈，受审核方部分遵守该原则。位于生产厂房屋顶的2个废气排放口没有废气排放口标识牌。管理层说标识牌坏了，他们正在采购新的。这违反了排污口规范化整治技术要求第4.1条。