

Monitored Party ShenZhen Originality Technology Co.,Ltd	amfori ID 156-041223-000	Address 301, Building A1, Zhengfeng Industrial Park, No. 610, Fengtang Avenue, Zhancheng Community, Fuhai Street, Bao'an District, Shenzhen, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner SGS
Monitoring Start Date 21/01/2026	Closing Meeting Finished Date 21/01/2026	Submission Date 28/01/2026
Expiration Date 28/01/2027	Announcement Type Semi Announced	
Site ShenZhen Originality Technology Co.,Ltd.	Site amfori ID 156-041223-002	

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OVERALL RATING



SECTION RATING

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

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

【Audit team's information】

Monitoring firm: SGS (Monitoring firm APSCA #: 11600006)

Auditor: Kelvin Wang; APSCA Number: CSCA 21701932

【Name of observers, translators, trainees, advisors/consultants (if applicable)】: Nil

【Audit schedule details】: The audit was planned for 1 auditor in 1 day. The full audit(Semi Announced) was conducted from 8:30 AM to 5:00 PM on Jan 21, 2026

【Business partner information】:

ShenZhen Originality Technology Co.,Ltd. (深圳市匠心原创科技有限公司) is located at 301, Building A1, Zhengfeng Industrial Park, No. 610, Fengtang Avenue, Zhancheng Community, Fuhai Street, Bao'an District, Shenzhen, Shenzhen, Guangdong, China (中国广东省深圳市宝安区福海街道展城社区凤塘大道610号正风工业园A1栋301). Business license No.: 91440300319534725L valid from Nov 19, 2014 to long term. The main products were bluetooth headset and smartwatch. Production Capacity is about 30,000,000 pcs per year. The main production activities included assembly and packing.

【Audited location information】:

The main auditee rented and used 3F and half of 1F of one 4-storey production building(around 2240 quare meters each floor) as workshop, warehouse and office, the other floors were used by other factories, no share worker or share management was identified between them, this audit just covered the scope of the auditee.

No dormitory, kitchen or canteen were provided for workers. The detail floor distribution and area of as below:

One 4-storey production building:

1F: warehouse, 深圳市艾比克实业有限公司/ Shenzhen Abik Industrial Co., Ltd

2/F: 深圳市凯联讯电子科技有限公司/ Shenzhen Kailianxun Electronic Technology Co., Ltd

3/F: office, workshop, warehouse.

4/F: 深圳市艾比克实业有限公司/ Shenzhen Abik Industrial Co., Ltd

Remark: The factory moved from 501, Building 3, No. 59 Haoye Road, Zhancheng Community, Fuhai Street, Bao'an District, Shenzhen to the current location in Dec 2025. After an on-site obervation, it was confirmed that the old address is now vacant and the factory no longer occupies the old location.

【Operating shifts and hours and time recording system】: During the audit, the main auditee provided attendance records from Jan 1, 2025 to audit day and wage records from Jan 2025 to Dec 2025 for review. All employees used finger printing or face scanning attendance recorders to keep working time. The normal working time was 5 days per week and 8 hours per day. One shift was arranged in the factory, 8:00-12:00, 13:30-17:30, 2 hours 18:30-20:30 overtime on weekdays and 8 hours overtime worked on Saturdays were arranged, no overtime was arranged on Sundays and holidays. The maximum daily overtime was 2 hours, the maximum monthly overtime was 82 hours and maximum weekly working time was 58 hours. The main auditee guaranteed workers have at least 1 day off per 7 days, workers could choose work overtime or not, and the main auditee paid enough overtime wage according to legal requirements.

1st sampled month(Dec 2025) – standard hours (40) + maximum weekly OT (18)

2nd sampled month(Aug 2025) – standard hours (40) + maximum weekly OT (18)

3rd sampled month(Mar 2025) – standard hours (40) + maximum weekly OT (18)

【Salary payment details】: The main auditee set up wages paying and benefit policy. The wages paying policy show all workers' wages were paid by hourly rate wages, and wages were paid on 7h of the following month by bank. their minimum wage was RMB2520 per month since Mar 2025 and RMB2360 before Mar 2025, that was equal with the minimum wage standard of local city (RMB2520 per month since Mar 2025 and RMB2360 before Mar 2025). Workers' OT wages on weekdays and weekends were 150% and 200% of normal wages as per legal law. Other benefits such as paid annual leaves, statuary holidays etc. were provided to all employees according to legal laws.

【Worker number information】:

- Total worker number (production and management workers): Total 49 (41 production workers and 8 non-production workers).
- Production worker number (male and female number details should be given) : Total 41 (Male 25; Female 16)
- Vulnerable worker number (male and female number details should be given) : 28 domestic migrant male worker and 17 domestic migrant female workers, no young worker/child labor/disabilities/ Pregnant/Breastfeeding worker in the factory.
- Any other special group workers (interns, apprentices, contractor workers etc.) : Nil.

【Good practices】 : Nil

【Worker organization details】 : No union was formed in the main auditee, workers elected two worker representatives.

【Circumstances】 : Nil.

【The special circumstances can be classified as followed】 :

No special precaution was taken for COVID-19 in China now.

Based on search the information through “CreditChina” and QICHACHA website, no abnormal circumstances was identified.

【Summary of findings】 :

The non-compliances were as below 1.1 inadequate internal audit, 1.4 improper production capacity, 2.2 no monitoring for achievement of the objectives, 2.5 no communication channel for external communities, 6.2 monthly OT working hour working exceeded legal requirement, 7.1 imperfect H&S management system, 7.3 inadequate H&S assessment , 7.6 improper PPE, 7.7 no static protective ground facility was equipped at alcohol stored area, 7.11 10% goods in the warehouse were stacked against the wall.

No non-compliance was identified for other performance areas(PA3,4,5,8,9,10,11,12,13).

【Living wage calculation】 : The living wage data was obtained from GLWC website.

[Personal Information protection law]

The Personal Information Protection Law of the People's Republic of China was promulgated on August 20, 2021, the producer ensured that relevant personal data and information provided to SGS auditor(s) has been obtained the individual's consent during the audit.

【Attachments】 During document review it was evident that some of required documents are not applicable in organization like Agency Labour Contract, Government Waiver on working hours and Collective Bargaining Agreement. EIA was not required for the auditee as per legal requirement. All of above documents were not involved in document report.

SITE DETAILS

Site

ShenZhen Originality Technology Co.,Ltd.

Site amfori ID

156-041223-002

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Household Durables

Sub Industry

Consumer Electronics

amfori Process Classifications

N.A.

NACE Classification

Manufacture of consumer electronics

GS1 Classifications

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	49	Workers
Legal minimum wage in local currency	2,520	Monthly
Lowest wage paid for regular work at the site	2,520	Monthly
Calculated living wage in local currency	4,401	Monthly
Total sample	5	Workers

Other Metrics

Male workers	28	Workers
Female workers	21	Workers
Non-binary workers	0	Workers
Permanent workers - Male	28	Workers
Permanent workers - Female	21	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	0	Workers
Management - Female	0	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	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	28	Workers
Domestic migrant workers - Female	17	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	28	Workers
Workers hired directly - Female	21	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	3	Workers
Sample - Female	2	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: ShenZhen Originality Technology Co.,Ltd. | Site amfori ID: 156-041223-002

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	
1.1 Finding: The main auditee partially respects this principle because based on management and worker interviews and internal audit records in Mar 2025 review it was identified that the factory established completed amfori BSCI management system including plan-do-check-action cycle, but the root cause analysis of internal audit conducted by the factory was not so effective that it cannot avoid the same issue of working hour and H&S etc happening again. The facility management declared that they did not know the requirement. Reference: the requirement of question 1.1 in amfori BSCI system manual.	被审核方（生产商）部分遵循该准则。原因是经管理层和员工访谈和查看2025年3月的内审记录发现工厂已建立完整的amfori BSCI管理系统，其中也包括计划-执行-检查-改善循环，但由于工厂的内审原因分析并不仔细导致工时，健康安全等问题等无法避免再次发生。工厂管理层称他们不清楚要求。参考标准：amfori BSCI管理手册中问题1.1的要求。

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	
1.4 Finding: The main auditee partially respects this principle because based on management and worker interviews and production capacity records in 2025 review it was identified that the factory had realistically calculated the production capacity and delivery times. But calculation basis of production capacity is 8-10 hours per day, 6 days per week, 12 months per year which will lead to the things that monthly overtime exceeds 36 hours required by local law. The facility management declared that it's hard to control the overtime working hours. Reference: the requirement of question 1.4 in amfori BSCI system manual.	被审核方（生产商）部分遵循该准则。原因是经管理层和员工访谈和查看2025年的产能记录发现工厂了解如何计算生产产能和订单周期。但工厂产能规划的计算基准为每天8-10小时，6天每周，12月每年，这导致工厂员工月加班时间超过法律规定的36小时。工厂管理层称很难去控制加班时间。参考标准：amfori BSCI管理手册中问题1.4的要求。



PA 2: Workers Involvement and Protection

Site: ShenZhen Originality Technology Co.,Ltd. | Site amfori ID: 156-041223-002

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

2.2 Finding: The main auditee partially respects this principle because based on management and worker interviews and long-term objectives records in 2025 review it was identified that long-term objectives were established to protect workers. But there was no monitoring for achievement of the objectives, also long term goals do not take into account the different needs of women and vulnerable groups in the workplace. The facility management declared that they did not know the requirement. Reference: the requirement of question 2.2 in amfori BSCI system manual.

被审核方（生产商）部分遵守该准则，原因是经管理层和员工访谈和查看2025年的长期目标记录发现工厂建立了保护工人长期目标。但是未按照程序对目标达成情况进行监控，且长期目标未考虑到工作场所中女性和弱势群体的不同需求。工厂管理层称他们不清楚要求。参考标准：amfori BSCI管理手册中问题2.2的要求。

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

LOCAL LANGUAGE

Finding

2.5 Finding: The main auditee partially respects this principle based on management and worker interviews and grievance policy review it was identified that the factory had established grievance mechanism for internal workers, for example the worker could communicate with worker representative or manager directly, and there was a suggestion box to collect workers' complaint, but there was no communication channel for external communities. The facility management declared that they did not know the requirement. Reference: the requirement of question 2.5 in amfori BSCI system manual.

被审核方部分符合该原则，原因是经管理层和员工访谈和查看申诉政策发现工厂为内部员工建立了申诉机制，如员工可以跟员工代表或经理直接沟通，且现场有意见箱收集员工投诉，但工厂未建立与当地社区的沟通渠道。工厂管理层称他们不清楚要求。参考标准：amfori BSCI管理手册中问题2.5的要求。

PA 6: Decent Working Hours

Site: ShenZhen Originality Technology Co.,Ltd. | Site amfori ID: 156-041223-002

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

6.2 Finding: The main auditee does not respect this principle because the monthly OT hours exceeded legal requirement. Based on provided attendance records from Jan 1, 2025 to the audit day, all sample workers' monthly OT hours exceed legal requirement (36 hours per month) .
1st sampled month(Dec 2025) – standard hours (184) + maximum monthly OT (78)
2nd sampled month(Aug 2025) – standard hours (168) + maximum monthly OT (82)
3rd sampled month(Mar 2025) – standard hours (168) + maximum monthly OT (82)
The facility management declared that it's hard to control the overtime working hours.
Reference: Labor Law of the People's Republic of China (2018 Amendment), Article 41.

被审核方（生产商）因员工月加班超过法规要求而未遵循该准则。根据工厂提供的自2025年1月1日至审核当日的考勤记录，所有抽样员工的加班均超过法规要求的36小时每月。
第一个抽样月（2025年12月）-标准工时（184小时）+最大月加班（78小时）
第二个抽样月（2025年8月）-标准工时（168小时）+最大月加班（82小时）
第三个抽样月（2025年3月）-标准工时（168小时）+最大月加班（82小时）
工厂管理层称很难去控制加班时间。参考法规：中华人民共和国劳动法（2018修正）第四十一条。

PA 7: Occupational Health and Safety

Site: ShenZhen Originality Technology Co.,Ltd. | Site amfori ID: 156-041223-002

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

ENGLISH

LOCAL LANGUAGE

Finding

7.1 Finding: The main auditee partially respects this principle because based on management interview and document interview, the auditee had established management system on health and safety, identified and collected of related legal regulation. But there were still health safety findings issued due to management negligence. Reference: the requirement of question 7.1 in amfori BSCI system manual.

被审核方（生产商）部分遵循该准则，原因是通过管理层访谈及文件查看，被审核方已建立健康安全管理体系，识别并收集了相关法规。但是由于管理疏忽，导致审核期间仍然有部分健康安全问题发生。
参考标准：amfori BSCI管理手册中问题7.1的要求。

Question: 7.3 Is there satisfactory evidence that the auditee set up an effective management system that ensures they regularly carry out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH

LOCAL LANGUAGE

Finding

7.3 Finding: The main auditee partially respects this principle because the factory had carried out risk assessment for safe, healthy and hygienic working conditions, but it did not take into account the

被审核方（生产商）部分遵循该准则。原因是工厂有针对安全、健康和卫生工作条件进行风险评估，但未考虑到女性特殊卫生用具和哺乳期女工的特殊需求。工厂代表称不清楚要求。参考：amfori BSCI管

Finding	
special hygiene equipment for women and the special needs of breastfeeding female workers. The factory management told they did not know the requirement. Reference: the requirement of question 7.3 in amfori BSCI system manual.	理手册中问题7.3的要求。

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	
7.6 Finding : The main auditee does not respect this principle because the factory provided active carbon mask but not dust proof mask for soldering workers, the factory did not provide goggle for Lasering worker. The factory management told they did not know the requirement. Reference: Labor Law of the People's Republic of China (2018 Amendment), Article 54.	主要被审核方（生产商）未遵守该原则，原因是工厂为焊锡工人提供的口罩是活性炭口罩而不是防尘口罩，工厂没有为镭射工人提供护目镜。工厂代表称不清楚该要求。参考法规：中华人民共和国劳动法（2018修正）第五十四条。

Question: 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

ENGLISH	LOCAL LANGUAGE
Finding	
7.7 Finding : The main auditee does not respect this principle because based on onsite observation, no static protective ground facility was equipped at alcohol stored area. The factory management explained that they ignored this . Reference: Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 20.	主要被审核方（生产商）未遵守该原则，原因是根据现场观察，酒精存放区没有配备防静电接地设施，工厂代表称他们忽略了这点。参考：危险化学品安全管理条例（2013修订）第二十条。

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH	LOCAL LANGUAGE
Finding	
7.11 Finding: The main auditee partially respects this principle, because 10% goods in the warehouse were stacked against the wall. The	被审核方部分遵守该原则，原因是工厂仓库有约10%的货物靠墙堆放。工厂代表称他们忽略了这点。

Finding

factory management explained that they ignored this. Reference: Regulations on Fire Prevention of Warehouse (1990) Article 18.

参考法规：仓库防火安全管理规则（1990）第十八条。