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Audit Report

Private and Confidential

Desktop Review (DR)

Factory Response in Progress

Dongguan Boyuan Eastar Co., Ltd

Factory ID: C021565

Audit Date: 2026-06-01 – 2026-06-01

MIHOX

Factory Information

Factory ID:	C021565		
Factory Name (English):	Dongguan Boyuan Eastar Co., Ltd		
Factory Name on BR (Local Language):	东莞市博源易思达益智科技有限公司		
Factory Address (English):	Room 101, No.129, Qingxi Dongfeng Road, Qingxi Town, Dongguan City		
Factory Zip Code:	523646		
Factory Detailed Physical Address (Local Language):	中国广东省东莞市清溪镇清溪东风路129号一栋101室		
Factory Address on BR (Local Language):	广东省东莞市清溪镇清溪东风路129号一栋101室		
Factory Longitude and Latitude Address:	N22°49′38″ E114°12′30″		
Factory BR Number:	91441900MA5478KG8B		
Country / Region:	China		
Province / State:	Guangdong		
Phone Number:	86-769-87731880		
Fax Number:	Nil		
Factory Key Contact:	Name	Email	Telephone
	May Ding	may@eastarboardgame.com	18058272435
	peter	3243379206@qq.com	13691978632
No. of workers:	165		
Total no. of employees:	241		
Industries:	Toys/Premiums		
Products:	Action Figures, Board Games, Collections/Keepsakes, Electronic Games, Other Toy Product, Plastic Toys, Premiums		
Parent / Holding Company Name:	Nil		

Audit Information

Audit Date:	2026-06-01 to 2026-06-01
Audit Type:	DR
Audit Firm:	SGS-CSTC Standards Technical Services Co., Ltd (APSCA#:11600006)
Auditors:	Grace You
Announced/Unannounced Audit:	Announced

Findings Summary

Finding Category	Finding Type	Grading	Finding Details

Factory Profile

Factory Employees	Number (Audit)	Number (Peak Season)	Number (Low Season)
Total Employees	241	241	241
Manufacturing workers	165	165	165
Warehouse / Distribution	4	4	4
Quality Assurance/Control	5	5	5
Engineering/Maintenance	52	52	52
Administrative / Others	15	15	15

Dialect	Dialect 1	Dialect 2	Dialect 3	Dialect 4	Dialect
Dialect Spoken by Employees	Chinese				
Percentage of Employees (%)	100				

Factory Manufacturing Process and Capacity List	Yes	Units of Machinery / Facilities
Blow Molding		
Rotational Molding		
Injection Molding	Y	38 sets
Die Cast		
Spraying Painting	Y	72 booths
Tempo Printing	Y	35 sets
Silk Screen Printing	Y	1 set
Vacuum Plating		
Sewing		
Hair Rooting		
Metal Work		
Metal Plating		
Wood Processing		
SMT		
IC Bonding		
Electronics Assembly		
General Assembly	Y	7 lines
Packing	Y	7 lines
Flat Belt Conveyor	Y	7 lines
Paper Printing		
Others Manufacturing Process (Please specify manufacturing process, and units of machinery / facilities)	Y	Crushing machine: 4 sets; Mixing machine: 2 sets.

Factory Premises					
Premises in Main Factory	**Total**	**Production**	**Warehouse**	**Dormitory**	**Others**
Number of Buildings	5	2	1	1	1
Occupied Area(M^2)	10052	6748	1050	1360	894
Please specify Multiple Factories within the boundary of Main Factory (If applicable)	N/A				
In addition to Main Factory, outside Premises to be covered in audit (If applicable)	**Site Name & Actual Detailed Address (Local Language)**				
Site 1	N/A				
Site 2	N/A				
Site 3	N/A				
Site 4	N/A				
Site 5	N/A				
Please specify if the factory has installed a lightning-protection system.	Yes				

Factory Operation Information	
Subcontracted Process (If applicable)	Nil
Date of Factory Establishment Business Registration/License	2019-12-18
Peak Production Months	Not obvious
Factory Working Days System (5/6 days)	5 days per week (8 hrs x 5 days)
Normal Work Hours and Shift Arrangement	All production departments except injection molding: 08:00-12:00, 13:30-17:30, OT from 18:30.
Department(s) Running 2 Shifts	Injection molding department
Department(s) Running 3 Shifts	Nil

Maximum working hours per day / week in retrieved period				
	Year	**Month**	**Hours/Day**	**Hours/Week**

Factory Audit History	
Audit Type	**Audit Date**
ICA	2026-05-19

0. Audit Overview		
Part 0.1 General information of Audit	Compliance	Comments / Finding Details
0.0.1 Executive Summary & Specific Situation observed:		This is a desktop review; the previous ICA was conducted on May 18-19, 2026. This audit is based on the desktop document review only. The factory provided proofs indicated that all the findings of previous audit had been closed. Below information was identified during last audit: This audit included the overnight audit and covered all shifts carried out in the factory. Two shifts were carried out in the injection molding department, 08:00-20:00 (day shift), 20:00-08:00 (night shift). Total 27 workers involved in the night shift during the overnight audit. The two shifts were exchanged once per two weeks.
1. Audit Process		
Part 1.1 Transparency	Compliance	Comments / Finding Details

Part 1.2 Interference	Compliance	Comments / Finding Details
2. Business Ethics		
Part 2.1 Policy	Compliance	Comments / Finding Details
Part 2.2 Training	Compliance	Comments / Finding Details
Part 2.3 Business Partner Management	Compliance	Comments / Finding Details
3. Employment Practices		
Part 3.1 Policy	Compliance	Comments / Finding Details
Part 3.2 Training	Compliance	Comments / Finding Details
Part 3.3 Underage Workers	Compliance	Comments / Finding Details
Part 3.4 Documentation	Compliance	Comments / Finding Details
Part 3.5 Contracts	Compliance	Comments / Finding Details
Part 3.6 Homework and Cottage Work	Compliance	Comments / Finding Details
Part 3.7 Recruitment	Compliance	Comments / Finding Details
Part 3.8 Foreign Migrant Workers	Compliance	Comments / Finding Details
4. Special Protections		
Part 4.1 Young Workers	Compliance	Comments / Finding Details
Part 4.2 Pregnant Workers	Compliance	Comments / Finding Details
5. Working Hours		
Part 5.1 Policy	Compliance	Comments / Finding Details
Part 5.2 Documentation	Compliance	Comments / Finding Details
Part 5.3 Working Hours	Compliance	Comments / Finding Details
Part 5.4 Breaks	Compliance	Comments / Finding Details
6. Compensation		
Part 6.1 Policy	Compliance	Comments / Finding Details
Part 6.2 Wages and Benefits	Compliance	Comments / Finding Details
6.2.3 Does the facility provide 100% coverage on worker injury insurance and other legally required benefits to workers?	Yes	NC found in Initial Certification Audit: The factory did not provide injury insurance to all workers before Apr 24, 2026. For example, the factory only provided injury insurance to 138 out of 162 workers in Mar 2026. Desktop document review on Jun 01, 2026: Closed. 1. The factory provide injury insurance to all workers since Apr 24, 2026. 2. The factory established employee insurance purchase inspection system, and the appointed staff conducted daily inspection to ensure injury insurance for all the employees. The relevant employees obtained training on insurance management on May 21, 2026.
Part 6.3 Withholdings and Deductions	Compliance	Comments / Finding Details
Part 6.4 Payroll and Pay slips	Compliance	Comments / Finding Details
7. Disciplinary Practices		
Part 7.1 Policy	Compliance	Comments / Finding Details
Part 7.2 Training	Compliance	Comments / Finding Details
Part 7.3 Implementation	Compliance	Comments / Finding Details
8. Forced & Prison Labor		
Part 8.1 Policy	Compliance	Comments / Finding Details
Part 8.2 Training	Compliance	Comments / Finding Details
Part 8.3 Implementation	Compliance	Comments / Finding Details
Part 8.4 Human Trafficking	Compliance	Comments / Finding Details
9. Discrimination		
Part 9.1 Policy	Compliance	Comments / Finding Details
Part 9.2 Implementation	Compliance	Comments / Finding Details
Part 9.3 Reporting Mechanism	Compliance	Comments / Finding Details
10. Grievance Mechanisms		
Part 10.1 Policy	Compliance	Comments / Finding Details
Part 10.2 Employee Representation	Compliance	Comments / Finding Details
Part 10.3 Freedom of Association	Compliance	Comments / Finding Details
Part 10.4 Worker Helpline	Compliance	Comments / Finding Details
11. Facilities		
Part 11.1 Policy	Compliance	Comments / Finding Details
Part 11.2 Emergency Communication	Compliance	Comments / Finding Details
Part 11.3 facility Security	Compliance	Comments / Finding Details
Part 11.4 Building Safety	Compliance	Comments / Finding Details
Part 11.5 Housekeeping	Compliance	Comments / Finding Details
Part 11.6 Working Conditions	Compliance	Comments / Finding Details
Part 11.7 Drinking Water	Compliance	Comments / Finding Details

11.7.2 Is potable drinking water tested periodically?	Yes	NC found in Initial Certification Audit: The factory did not provide drinking water test report at the production area. The drinking water at the production area was tap water. Desktop document review on Jun 01, 2026: Closed. 1. The factory conducted drinking water test at the production area, and obtained the report on May 28, 2026, testing lab is Waltek Testing Group HCT (Shenzhen) Co., Ltd., and the result was acceptable. 2. The factory provided training on drinking water safety for relevant employees on May 22, 2026.
Part 11.8 Sanitation	Compliance	Comments / Finding Details
Part 11.9 Medical Safeguards	Compliance	Comments / Finding Details
Part 11.10 Vehicles	Compliance	Comments / Finding Details
12. Fire & Emergency		
Part 12.1 Policy	Compliance	Comments / Finding Details
Part 12.2 Emergency Response Personnel	Compliance	Comments / Finding Details
Part 12.3 Fire Acceptance Certificate	Compliance	Comments / Finding Details
Part 12.4 Exit and Evacuation	Compliance	Comments / Finding Details
Part 12.5 Fire Fighting System	Compliance	Comments / Finding Details
Part 12.6 Alert System	Compliance	Comments / Finding Details
Part 12.7 Emergency Drills	Compliance	Comments / Finding Details
Part 12.8 Electrics	Compliance	Comments / Finding Details
Part 12.9 Flammable and Combustible Hazards	Compliance	Comments / Finding Details
Part 12.10 Smoking Rules	Compliance	Comments / Finding Details
Part 12.12 Emergency Investigation & Reporting	Compliance	Comments / Finding Details
13. E, H & S (EHS)		
Part 13.1 EHS Program	Compliance	Comments / Finding Details
Part 13.2 Training	Compliance	Comments / Finding Details
Part 13.3 EHS Committee	Compliance	Comments / Finding Details
Part 13.4 Occupational Health	Compliance	Comments / Finding Details
Part 13.5 Personal Protective Equipment (PPE)	Compliance	Comments / Finding Details
Part 13.6 Workplace Safety	Compliance	Comments / Finding Details
Part 13.7 Machinery Safety	Compliance	Comments / Finding Details
Part 13.8 Equipment Safety	Compliance	Comments / Finding Details
Part 13.9 Hot-Work and Gas Cylinders	Compliance	Comments / Finding Details
Part 13.10 Chemical Safety	Compliance	Comments / Finding Details
13.10.7 Is secondary containment used in work areas for bulk liquid chemical storage?	Yes	NC found in Initial Certification Audit: No secondary containment was available for about 50% chemicals used in the factory. Such as, one bucket of cleanser used in dust-free workshop on 2/F of production building A, all chemicals stored in spraying painting workshop on 1/F of production building B. Desktop document review on Jun 01, 2026: Closed. 1. The factory provided secondary containment for all chemicals used in the factory, including one bucket of cleanser used in dust-free workshop on 2/F of production building A and all chemicals stored in spraying painting workshop on 1/F of production building B. 2. The factory provided training on chemical secondary containment for relevant workers on May 21, 2026, and the appointed staff conduct regularly inspection to ensure secondary containment be provided for all chemicals.
Part 13.11 Incident Investigation and Reporting	Compliance	Comments / Finding Details
Part 13.12 Environmental	Compliance	Comments / Finding Details
14. Dormitory & Canteen		
Part 14.1 Facility	Compliance	Comments / Finding Details
Part 14.2 Emergency Preparedness Policy	Compliance	Comments / Finding Details
Part 14.3 Exit and Evacuation	Compliance	Comments / Finding Details
Part 14.4 Fire Fighting System	Compliance	Comments / Finding Details
Part 14.5 Emergency Alert System	Compliance	Comments / Finding Details
Part 14.6 Canteen	Compliance	Comments / Finding Details
Part 15.1 Work Hour DetailsPart	Compliance	Comments / Finding Details

Section 3: Photos



13.10.7-A



13.10.7-B



13.10.7-C

Disclaimer:
Always verify the authenticity of any Ethical Supply Chain Program Audit Report.
Ethical Supply Chain Program Members can verify by using their Connect account.
For information on how to verify Audit Reports, contact us at info@ethicalsupplychain.org
In 2024, the ICTI Ethical Toy Program, formerly ICTI CARE Process, became the Ethical Supply Chain Program. Find out more at www.ethicalsupplychain.org

ethical supply chain program
FOUNDED BY ICTI

Audit Report

Private and Confidential

Initial Certification Audit (ICA)

Factory Response in Progress

Dongguan Boyuan Eastar Co., Ltd

Factory ID: C021565

Audit Date: 2025-05-18 – 2026-05-19

ethicalsupplychain.org

Factory Information

Factory ID:	C021565		
Factory Name (English):	Dongguan Boyuan Eastar Co., Ltd		
Factory Name on BR (Local Language):	东莞市博源易思达益智科技有限公司		
Factory Address (English):	Room 101, No.129, Qingxi Dongfeng Road, Qingxi Town, Dongguan City		
Factory Zip Code:	523646		
Factory Detailed Physical Address (Local Language):	中国广东省东莞市清溪镇清溪东风路129号一栋101室		
Factory Address on BR (Local Language):	广东省东莞市清溪镇清溪东风路129号一栋101室		
Factory Longitude and Latitude Address:	N22°49′38″ E114°12′30″		
Factory BR Number:	91441900MA5478KG8B		
Country / Region:	China		
Province / State:	Guangdong		
Phone Number:	86-769-87731880		
Fax Number:	Nil		
Factory Key Contact:	Name	Email	Telephone
	May Ding	may@eastarboardgame.com	18058272435
	peter	3243379206@qq.com	13691978632
No. of workers:	165		
Total no. of employees:	241		
Industries:	Toys/Premiums		
Products:	Action Figures, Board Games, Collections/Keepsakes, Electronic Games, Other Toy Product, Plastic Toys, Premiums		
Parent / Holding Company Name:	Nil		

Audit Information

Audit Date:	2025-05-18 to 2026-05-19
Audit Type:	ICA
Audit Firm:	SGS-CSTC Standards Technical Services Co., Ltd (APSCA#:11600006)
Auditors:	Grace You (CSCA21701921), Scarlet Wang (CSCA21701999)
Announced/Unannounced Audit:	Unannounced

Findings Summary

Finding Category	Finding Type	Grading	Finding Details
Part 6.2 Wages and Benefits	6.2.3 Does the facility provide 100% coverage on worker injury insurance and other legally required benefits to workers?	Critical	[Non-Compliance]: The factory did not provide injury insurance to all workers before Apr 24, 2026. For example, the factory only provided injury insurance to 138 out of 162 workers in Mar 2026.
Part 11.7 Drinking Water	11.7.2 Is potable drinking water tested periodically?	Major	[Non-Compliance]: The factory did not provide drinking water test report at the production area. The drinking water at the production area was tap water.
Part 13.10 Chemical Safety	13.10.7 Is secondary containment used in work areas for bulk liquid chemical storage?	Major	[Non-Compliance]: No secondary containment was available for about 50% chemicals used in the factory. Such as, one bucket of cleanser used in dust-free workshop on 2/F of production building A, all chemicals stored in spraying painting workshop on 1/F of production building B.

Factory Profile

Factory Employees	Number (Audit)	Number (Peak Season)	Number (Low Season)
Total Employees	241	241	241
Manufacturing workers	165	165	165
Warehouse / Distribution	4	4	4
Quality Assurance/Control	5	5	5
Engineering/Maintenance	52	52	52
Administrative / Others	15	15	15

Workforce Composition

Nationality of Owner	Chinese						
Nationality of Management	Chinese						
Gender of Management (%)	Percentage of Female (%)	50		Percentage of Male (%)		50	
Primary Nationality of Workers (in rank order)	Country1	Chinese		Approximate % of total workforce		100%	
	Country2	N/A		Approximate % of total workforce			
	Country3	N/A		Approximate % of total workforce			
	Country4	N/A		Approximate % of total workforce			
	Country5	N/A		Approximate % of total workforce			
Please list ALL other nationalities represented:							

	Local			Migrant*			Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	
Male Worker Count	70	0	0	0	0	0	70
Female Worker Count	104	0	0	0	0	0	104
Total Worker Count	174	0	0	0	0	0	174

Dialect	Dialect 1	Dialect 2	Dialect 3	Dialect 4	Dialect
Dialect Spoken by Employees	Chinese				
Percentage of Employees (%)	100				

Factory Manufacturing Process and Capacity List	Yes	Units of Machinery / Facilities
Blow Molding		
Rotational Molding		
Injection Molding	Y	38 sets
Die Cast		
Spraying Painting	Y	72 booths
Tempo Printing	Y	35 sets
Silk Screen Printing	Y	1 set
Vacuum Plating		
Sewing		
Hair Rooting		
Metal Work		
Metal Plating		
Wood Processing		
SMT		
IC Bonding		
Electronics Assembly		
General Assembly	Y	7 lines
Packing	Y	7 lines
Flat Belt Conveyor	Y	7 lines
Paper Printing		
Others Manufacturing Process (Please specify manufacturing process, and units of machinery / facilities)	Y	Crushing machine: 4 sets; Mixing machine: 2 sets.

Factory Premises					
Premises in Main Factory	**Total**	**Production**	**Warehouse**	**Dormitory**	**Others**
Number of Buildings	5	2	1	1	1
Occupied Area(M2)	10052	6748	1050	1360	894
Please specify Multiple Factories within the boundary of Main Factory (If applicable)	N/A				
In addition to Main Factory, outside Premises to be covered in audit (If applicable)	**Site Name & Actual Detailed Address (Local Language)**				
Site 1	N/A				
Site 2	N/A				
Site 3	N/A				
Site 4	N/A				
Site 5	N/A				
Please specify if the factory has installed a lightning-protection system.	Yes				

Factory Operation Information	
Subcontracted Process (If applicable)	Nil
Date of Factory Establishment Business Registration/License	2019-12-18
Peak Production Months	Not obvious
Factory Working Days System (5/6 days)	5 days per week (8 hrs x 5 days)
Normal Work Hours and Shift Arrangement	All production departments except injection molding: 08:00-12:00, 13:30-17:30, OT from 18:30.
Department(s) Running 2 Shifts	Injection molding department
Department(s) Running 3 Shifts	Nil

Maximum working hours per day / week in retrieved period	Year	Month	Hours/Day	Hours/Week
*7th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2025	10	11.50	66.50
*8th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2025	11	11.50	66.00
*9th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2025	12	11.50	66.00
*10th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2026	1	11.50	66.00
*11th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2026	2	11.50	66.00
*12th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2026	3	11.50	66.00
*13th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2026	4	11.50	66.00
*14th month(Full or partial month)-Maximum working hours per day/per week in the retrieved period:	2026	5	11.50	66.00

Factory Audit History	
Audit Type	**Audit Date**

0. Audit Overview		
Part 0.1 General information of Audit	Compliance	Comments / Finding Details
0.0.1 Executive Summary & Specific Situation observed:		This audit included the overnight audit and covered all shifts carried out in the factory. Two shifts were carried out in the injection molding department, 08:00-20:00 (day shift), 20:00-08:00 (night shift). Total 27 workers involved in the night shift during the overnight audit. The two shifts were exchanged once per two weeks.
0.0.2 Good Practices observed:		Nil
0.0.3 Period of Time Records reviewed:		Oct 01, 2025 to the audit day (May 19, 2026)
0.0.4 Period of Payroll Records reviewed:		Oct 2025 to Mar 2026
0.0.5 Sample Size:		20
1. Audit Process		
Part 1.1 Transparency	Compliance	Comments / Finding Details
1.1.1 Has the facility allowed the audit to be conducted without denial of access? [Zero Tolerance] Not transparent on-site [Critical] On-site transparent	Yes	
1.1.2 Has the facility allowed the audit to be conducted without intentional concealment or hidden audit scope? [Zero Tolerance] Not transparent on-site [Critical] On-site transparent	Yes	
Part 1.2 Interference	Compliance	Comments / Finding Details
1.2.1 Is the whole assessment process free from bribery attempts?	Yes	
1.2.2 Is the coaching of workers prohibited?	Yes	
2. Business Ethics		
Part 2.1 Policy	Compliance	Comments / Finding Details
2.1.1 Does the facility have a Business Integrity policy?	Yes	Document Number: RBA-QP-36; Date of issue: Jan 02, 2024.
2.1.2 Is there a designated staff member responsible for implementing the Business Integrity policy?	Yes	The title of Responsible Person: Admin Manager.
Part 2.2 Training	Compliance	Comments / Finding Details
2.2.1 Are staff, who may be exposed to unethical behavior, trained on the contents of the policy?	Yes	Date of the latest training: Nov 12, 2025; Names of the trained department: All departments.
Part 2.3 Business Partner Management	Compliance	Comments / Finding Details
2.3.1 Has the facility communicated the expectation of legal and ESCP requirements compliance to its business partners?	Yes	Types of the business partners: service providers.
3. Employment Practices		
Part 3.1 Policy	Compliance	Comments / Finding Details
3.1.1 Does the facility have a responsible recruitment policy in line with legal and ESCP requirements?	Yes	Document Number: RBA-QP-02; Date of issue: Jan 02, 2024. The minimum working age: 16 years old.
3.1.2 Are the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication: Included orientation, employee handbook, notice board, training, etc.
Part 3.2 Training	Compliance	Comments / Finding Details
3.2.1 Are staff responsible for hiring trained with records maintained?	Yes	Title of Responsible Person: HR staff. Date of the latest training: Feb 27, 2026.
Part 3.3 Underage Workers	Compliance	Comments / Finding Details
3.3.1 Are underage workers prohibited in the facility?	Yes	The age of the youngest workers: 18 years old.
3.3.2 Does the facility have no cases of historical underage workers?	Yes	
Part 3.4 Documentation	Compliance	Comments / Finding Details
3.4.1 Are workers' personnel files accurately maintained?	Yes	
3.4.2 Are workers' identification documents valid?	Yes	
Part 3.5 Contracts	Compliance	Comments / Finding Details
3.5.1 Do workers' labor contracts meet regulatory and legal requirements?	Yes	
3.5.2 Is a labor contract signed with each worker, where required and applicable?	Yes	The window for signing the contracts: within one month when recruitment.
3.5.3 Do workers receive the contract signed by both parties?	Yes	
Part 3.6 Homework and Cottage Work	Compliance	Comments / Finding Details
3.6.1 Are homework and cottage work prohibited?	Yes	No homework and cottage work was identified during the audit.
Part 3.7 Recruitment	Compliance	Comments / Finding Details
3.7.1 Does the facility have a policy which identifies, prohibits and remediates the charging of recruitment fees to workers?	Yes	Document Number: RBA-QP-01; Date of issue: Jan 02, 2024.
3.7.2 Has the facility verified that dispatching companies, recruitment brokers and agents used adhere to legal hiring practices?	N/A	No dispatching companies or brokers or agents were used.
Part 3.8 Foreign Migrant Workers	Compliance	Comments / Finding Details

3.8.1 Does the employment of foreign migrant workers comply with legal requirements?	N/A	No foreign migrant worker was used by the factory.
3.8.2 Does the facility prohibit charging foreign migrant workers recruitment related fees?	N/A	No foreign migrant worker was used by the factory.
4. Special Protections		
Part 4.1 Young Workers	Compliance	Comments / Finding Details
4.1.1 If young workers are present, are they working on allowable assignments, as specified by legal and ESCP requirements?	N/A	No young worker was employed in the factory.
4.1.2 Does the facility keep a list of appropriate assignments for young workers?	N/A	
Part 4.2 Pregnant Workers	Compliance	Comments / Finding Details
4.2.1 Are pregnant workers assigned appropriate job tasks?	Yes	
4.2.2 Are pregnant workers given additional necessary and reasonable breaks?	Yes	
4.2.3 Are female workers with breastfeeding needs provided with appropriate space and breaks?	Yes	
5. Working Hours		
Part 5.1 Policy	Compliance	Comments / Finding Details
5.1.1 Does the facility have a written working hours policy that meets ESCP requirements?	Yes	Document Number: RBA-QP-05; Date of issue: Jan 02, 2024.
5.1.2 Are the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication included orientation, employee handbook, notice board, training, etc.
Part 5.2 Documentation	Compliance	Comments / Finding Details
5.2.1 Do working hour and payroll records accurately reflect all time worked? [Critical] Not transparent on-site [Major] On-site transparent	Yes	
5.2.2 Are all hours worked documented? [Critical] > 20% sampled record incomplete or with errors [Major] ≤ 20% sampled record incomplete or with errors	Yes	Time records keeping method: Face scanning system.
5.2.3 Are workers aware of, and able to verify, their working hours in their time records? [Major] No such verification channel exists / > 20% of sampled workers cannot verify or are unaware of the verification channel [Minor] ≤ 20% of sampled workers cannot verify or are unaware of the verification channel	Yes	Verification channel: Computerized attendance system, printed payrolls with working hours information. Workers can verify their working hours in HR department.
Part 5.3 Working Hours	Compliance	Comments / Finding Details
5.3.1 Are maximum weekly working hours within ESCP requirements? [Critical] Max. weekly working hours are higher than 78 hours [Major] Max. weekly working hours are higher than 72 hours, but less or equal to 78 hours	Yes	1) General situation: Face scanning system was used for tracking attendance. Records from Oct 01, 2025 to the audit date (May 19, 2026) were provided for review. A pre-defined week was from Monday to Sunday in the factory. 2) General operation hours: There were two shifts carried out in injection molding department, for example, day shift: 08:00-20:00, night shift: 20:00-08:00, with 3 OT hours and twice 0.5 hours rest per shift. Only day shift was carried out in other departments, 08:00-12:00, 13:30-17:30, and OT from 18:30, and 0-11.5 hours on Saturday or Sunday. 3) Maximum daily working hours: 11.5 hours. 4) Maximum weekly working hours: 66.5 hours. 5) Maximum monthly overtime hours: 113.5 hours in Jan 2026.
Part 5.4 Breaks	Compliance	Comments / Finding Details
5.4.1 Do workers receive 1 day off in a pre-defined week? [Critical] > 20% of sampled workers are not given the day off / 1 sampled worker has worked more than 13 days consecutively [Major] ≤ 20% of sampled workers are not given the day off	Yes	The definition of the week: A pre-defined week was from Monday to Sunday in the factory. Maximum consecutive working days: 11 days from May 06, 2026 (Wednesday) to May 16, 2026 (Saturday) in the last 3 months, all workers received 1 day off in a pre-defined week. Remark: Based on attendance records from Oct 01, 2025 to Dec 31, 2025 provided by the factory, it was noted 80% sampled workers did not have one day off in the pre-defined week in 2 weeks of Oct 2025, and the maximum continuous working days were 26 days from Oct 07, 2025 to Nov 01, 2025.
5.4.2 Do workers receive meal breaks of at least 30 minutes? [Critical] > 20% of sampled workers do not receive such breaks [Major] ≤ 20% of sampled workers do not receive such breaks	Yes	

5.4.3 Do workers receive breaks of at least 15 minutes after 6 consecutive hours worked? [Critical] > 20% of sampled workers do not receive such breaks [Major] ≤ 20% of sampled workers do not receive such breaks	Yes	
5.4.4 Are workers provided with at least 10 consecutive hours rest in a predefined 24-hour cycle? [Critical] > 20% of sampled workers are not provided with such rest / 1 sampled worker has less than 8 hours [Major] ≤ 20% of sampled workers are not provided with such rest	Yes	
5.4.5 Are workers allowed toilet and water breaks?	Yes	
6. Compensation		
Part 6.1 Policy	Compliance	Comments / Finding Details
6.1.1 Does the facility have a written policy for wages and benefits that meet local laws and ESCP requirements?	Yes	Document Number: RBA-QP-06; Date of issue: Jan 02, 2024.
6.1.2 Are the contents of the policy made available and effectively communicated to all workers with advisory support made available?	Yes	Ways of Communication included orientation, employee handbook, notice board and etc.
Part 6.2 Wages and Benefits	Compliance	Comments / Finding Details
6.2.1 Are all wages and benefits documented on payroll records? [Critical] > 20% sampled incomplete or have errors [Major] ≤ 20% sampled incomplete or have errors	Yes	The items displayed: Gross wage, basic wage, OT hours worked, OT wage, paid leave, paid leave wage, allowance, withholdings, etc.
6.2.2 Do wages paid to workers meet legal requirements?	Yes	Current Legal requirements: Minimum Wages: RMB2080 per month (US$301.39); Effective Date: Mar 01, 2025; Minimum Hourly Rate: RMB11.95 per hour (US$1.73); Work Day OT Rate: RMB17.93 per hour (US$2.60); Rest Day OT Rate: RMB23.91 per hour (US$3.46); Holiday OT Rate: RMB35.86 per hour (US$5.20). According to reviewing of the working hour records and payroll records, the following points were observed: 1) Minimum wages paid by the factory: RMB2400/month (US$347.59). 2) Wages Calculation Method: All workers were paid by hourly rate wage according to labor contract. All workers were paid overtime work on normal working days, rest days and statutory holidays as 150%, 200% and 300% of normal rates respectively. 3) The component of the wages: Gross wage, basic wage, OT hours worked, OT wage, paid leave, paid leave wage, allowance, withholdings, etc. 4) 15 minutes beyond working hours were not found. 5) Sampled workers' monthly average wage was RMB4000 (US$580.01) .
6.2.3 Does the facility provide 100% coverage on worker injury insurance and other legally required benefits to workers?	Critical	1. Annual Leave was provided at least 5 days or more to workers based on their service lengths and workers could enjoy annual leave at any time. 2. Sick Leave was provided and 100% of the basic wage was paid. 3. Maternity Leave was provided at least 178 days for pregnant workers. -The latest month of social insurance receipt reviewed: May 2026 -Total employees: the no. should be provided with social insurance in the latest month: 199 -Work-related Injury Insurance provided for all workers? No -Any commercial insurance as supplementary (for injury, if applicable) and the corresponding no. of employees. Yes, the factory purchased a copy of commercial insurance to 61 employees from Jun 30, 2025 to Jun 30, 2026 and 108 employees from Apr 23, 2026 to Apr 22, 2027, which covered 145 workers who were not provided with social work injury insurance and 18 retired workers. The rest 21 retired workers were covered by work injury insurance for specific people. Therefore, all 238 employees were covered with work-related injury insurance during the audit. Total employees: 199 Work Injury: 54(27.14%) Medical: 54(27.14%) Maternity: 54(27.14%) Retirement: 54(27.14%) Unemployment: 54(27.14%) [Non-Compliance]: The factory did not provide injury insurance to all workers before Apr 24, 2026. For example, the factory only provided injury insurance to 138 out of 162 workers in Mar 2026.
Part 6.3 Withholdings and Deductions	Compliance	Comments / Finding Details
6.3.1 Does the facility have a written policy for replacement items in the case of loss or damage by workers?	Yes	Document Number: CSR-M-01; Date of issue: Aug 01, 2025.
6.3.2 Are deposits for facility provided items prohibited?	Yes	
6.3.3 Are withholdings or deductions reasonable?	Yes	

6.3.4 Are all legal withholdings or deductions recorded and paid to authority(s)? [Critical] >20% sampled not in line or recorded or not paid to agency [Major] ≤20% sampled are not in line or recorded or not paid to agency	Yes	Types of withholdings or deductions: Social insurance premiums; Range of withholdings or deductions: RMB0-415.43/month; For which agency: Social insurance bureau; Supporting records: wage records and payment receipts of social insurances.
6.3.5 Are workers given the choice of enrollment for reasonably priced food and housing?	Yes	The price for Housing/food: Free. No transportation was provided for workers.
Part 6.4 Payroll and Pay slips	Compliance	Comments / Finding Details
6.4.1 Are all workers paid on time?	Yes	Normal payment day of each month: At the end of following month. Payment day for resignation/termination workers: Within 1 working days.
6.4.2 Are workers paid directly?	Yes	Payment by bank transfer for in-service workers and payment by cash for resignation/termination workers
6.4.3 Are workers provided with detailed and accurate pay slips?	Yes	
7. Disciplinary Practices		
Part 7.1 Policy	Compliance	Comments / Finding Details
7.1.1 Does the facility have a written policy for disciplinary practices detailing the handling procedures for disciplinary cases?	Yes	Document Number: CR-M-002; Date of issue: Jan 02, 2024.
7.1.2 Are the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication: Through Orientation, Employee Handbook and Notice Book.
Part 7.2 Training	Compliance	Comments / Finding Details
7.2.1 Are supervisory staffs trained on disciplinary policies and procedures?	Yes	The latest training date: Nov 21, 2025.
Part 7.3 Implementation	Compliance	Comments / Finding Details
7.3.1 *Are physical abuse, coercion, corporal punishment and harassment prohibited?	Yes	
7.3.2 *Is unacceptable behavior of any kind prohibited?	Yes	
7.3.3 Is it prohibited to impose monetary fines on workers or demand excessive economic compensation from them?	Yes	
7.3.4 Are security staffs' roles and responsibilities appropriate and communicated?	Yes	
7.3.5 *Are security staffs adhere to their the roles and responsibilities?	Yes	
7.3.6 Does the facility employ adequate measures to avoid repeated instances of non-compliance in disciplinary practices?	Yes	
8. Forced & Prison Labor		
Part 8.1 Policy	Compliance	Comments / Finding Details
8.1.1 Does the facility have a written policy for forced and prison labor that meets ESCP requirements?	Yes	Document Number: RBA-QP-01; Date of issue: Jan 02, 2024.
8.1.2 Are the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication: Through Orientation, Employee Handbook and Notice Book.
Part 8.2 Training	Compliance	Comments / Finding Details
8.2.1 Are staff responsible for hiring trained with records maintained?	Yes	The latest training date: Feb 27, 2026.
Part 8.3 Implementation	Compliance	Comments / Finding Details
8.3.1 *Are workers free from any form of forced labor?	Yes	
8.3.2 *Is the withholding or confiscating of workers' belongings prohibited?	Yes	
8.3.3 *Are workers allowed freedom of movement during non-work hours?	Yes	
8.3.4 *Is the intentional retention of workers within certain areas prohibited?	Yes	
8.3.5 Is unreasonable curfew prohibited?	N/A	Curfew times: Nil.
8.3.6 *Are workers free to resign?	Yes	Notification period for resignation: 30 days' notification in advance for the employees and 3 days' notification in advance for new workers.
8.3.7 Are workers informed of overtime expectations and procedures?	Yes	Ways of being informed: verbal notification, written notice etc.
8.3.8 *Is forced overtime prohibited? [Zero Tolerance] Overtime work is not voluntary [Critical] Workers seek permission to opt out of OT	Yes	
8.3.9 *Is prison labor and rehabilitation program labor prohibited?	Yes	
Part 8.4 Human Trafficking	Compliance	Comments / Finding Details
8.4.1 *Is human trafficking activity prohibited?	Yes	
9. Discrimination		
Part 9.1 Policy	Compliance	Comments / Finding Details
9.1.1 Does the facility have a written policy for discrimination that meets legal and ESCP requirements?	Yes	Document Number: RBA-QP-08; Date of issue: Jan 02, 2024.
9.1.2 Is the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication: Through Orientation, Employee Handbook and Notice Book.

Part 9.2 Implementation	Compliance	Comments / Finding Details
9.2.1 *Is facility free from discrimination?	Yes	
Part 9.3 Reporting Mechanism	Compliance	Comments / Finding Details
9.3.1 Is there an effective reporting mechanism in place which allows workers to report concerns directly to management?	Yes	

10. Grievance Mechanisms

Part 10.1 Policy	Compliance	Comments / Finding Details
10.1.1 Does the facility have a written policy on workers' rights in line with legal and ESCP requirements?	Yes	Document Number: RBA-QP-09; Date of issue: Jan 02, 2024; Area Displayed: notice board.
10.1.2 Are the contents of the policy made available and effectively communicated to all workers?	Yes	Ways of Communication: Through Orientation, Employee Handbook and Notice Book.
Part 10.2 Employee Representation	Compliance	Comments / Finding Details
10.2.1 Do workers have effective communication channels with management and aware of such means? [Critical] No communication channel [Major] Ineffective communication	Yes	Means of Communication: Suggestion box, worker representative. The awareness of the interviewed workers: Good.
10.2.2 Are there freely selected worker representatives in place?	Yes	Date of selection: Mar 01, 2025; Number of total employee representative(s) and number of production workers included: 2 and 2.
10.2.3 *Are worker representatives treated the same as other workers?	Yes	
10.2.4 Are there management representatives in place?	Yes	The position of management representative(s): Admin Manager.
10.2.5 *Are regular meetings scheduled with minutes recorded?	Yes	Frequency of the meeting: Quarterly; The latest meeting date: May 11, 2026.
10.2.6 Are effective actions taken when issues are raised by workers?	Yes	The channels of grievance and suggestion: Suggestion box, worker representative, phone etc.
10.2.7 Are worker representatives aware of ESCP requirements?	Yes	The number of the employee representative(s) interviewed: 1.
Part 10.3 Freedom of Association	Compliance	Comments / Finding Details
10.3.1 Are union activities free from unreasonable management intervention or punishment?	Yes	
Part 10.4 Worker Helpline	Compliance	Comments / Finding Details
10.4.1 Are workers given information on the ESCP Worker Helpline?	Yes	
10.4.2 Are ESCP Helpline Cards and Posters free from alteration?	Yes	

11. Facilities

Part 11.1 Policy	Compliance	Comments / Finding Details
11.1.1 Does the facility have a written policy/policy statement to adopt legal requirements governing the environmental, health, safety and working conditions in its facilities?	Yes	Document Number: RBA-QM-01; Date of issue: Jan 02, 2024; Area Displayed: notice board.
11.1.2 Is there a senior management representative responsible for health, safety, welfare, and general facilities?	Yes	The title of representative(s): Admin Manager.
Part 11.2 Emergency Communication	Compliance	Comments / Finding Details
11.2.1 Is an effective means of communication available for internal and external emergency alerts?	Yes	Ways of Communication, Internal: phone, email etc. External: local emergency call 110, 119, 120.
Part 11.3 facility Security	Compliance	Comments / Finding Details
11.3.1 Are security guards effectively and adequately trained?	Yes	Date of latest training on security qualification: Jan 12, 2026; Date of latest training on safety: Jan 12, 2026.
11.3.2 Are children prohibited from entering facility production areas and warehouses?	Yes	
Part 11.4 Building Safety	Compliance	Comments / Finding Details
11.4.1 Has the physical and structural integrity of all buildings been professionally assessed?	Yes	Year of the main building constructed: 2001.
11.4.2 Are allowable floor loading weights determined, posted, and adhered to? [Critical] Any floor exceeding limit [Minor] Missing signage	Yes	The maximum loading limit(s): 800Kg/sq. meter.
Part 11.5 Housekeeping	Compliance	Comments / Finding Details
11.5.1 *Are facility areas clean and maintained in good condition?	Yes	
11.5.2 Are housekeeping inspections conducted?	Yes	Frequency of inspection: Daily; Date of latest inspection: May 19, 2026.
11.5.3 Are housekeeping issues rectified with a corrective action plan?	N/A	No violation was identified.
11.5.4 Are materials properly stored inside and outside of the building?	Yes	
11.5.5 Is refuse properly managed and promptly removed?	Yes	Frequency of inspection: Daily; Date of latest inspection: May 19, 2026.

Part 11.6 Working Conditions	Compliance	Comments / Finding Details
11.6.1 Does the facility have hot/cold stress mediation program?	Yes	Temperature during the audit: 26°C; Comments on historical records: 11~35°C; Controls and the program: Fan, herbal tea, air conditioner, etc.
11.6.2 Do general ventilation controls provide a safe working environment?	Yes	
11.6.3 Is lighting for work areas adequate?	Yes	
11.6.4 Have any citations or penalties for violations of laws on working conditions in the past 12 months been rectified?	N/A	No such case was noted.
11.6.5 Any citations or penalties for violations of laws on working conditions in the past 12 months were reported to ESCP within 48 hours?	N/A	No such case was noted.
Part 11.7 Drinking Water	Compliance	Comments / Finding Details
11.7.1 Do workers have access to clean drinking water? [Critical] Workers do not have access [Major] Water provided is not protected	Yes	
11.7.2 Is potable drinking water tested periodically?	Major	Dormitory area: Date of latest test: Sep 03, 2025; Testing lab: Waltek Testing Group HCT (Shenzhen) Co., Ltd. [Non-Compliance]: The factory did not provide drinking water test report at the production area. The drinking water at the production area was tap water.
Part 11.8 Sanitation	Compliance	Comments / Finding Details
11.8.1 Are adequate toilet facilities available?	Yes	
11.8.2 Are toilet facilities maintained in good condition?	Yes	
11.8.3 Are hand washing facilities available, functional, sanitary, and located within the toilet facilities area?	Yes	
Part 11.9 Medical Safeguards	Compliance	Comments / Finding Details
11.9.1 Does the facility have written procedures for handling medical emergencies?	Yes	Document Number: RBA-QP-20; Date of issue: Jan 02, 2024.
11.9.2 Is an on-site medical clinic or nearby public emergency medical treatment facility available?	Yes	
11.9.3 Does each shift have adequate certified personnel in first aid and cardiopulmonary resuscitation (CPR)?	Yes	Number of trained personnel of each shift: 4 for day shift, and 2 for night shift; Latest training date: Dec 30, 2025.
11.9.4 *Are first-aid supplies reasonably available in the production facility and dormitory?	Yes	
11.9.5 Is medical waste segregated and properly disposed of?	N/A	No medical waste was produced in the factory.
Part 11.10 Vehicles	Compliance	Comments / Finding Details
11.10.1 Are appropriate signs and visual-aid tools used to help traffic awareness for both vehicle and pedestrians?	Yes	
11.10.2 Are trailers or containers secured from movement by wheel locks?	Yes	
12. Fire & Emergency		
Part 12.1 Policy	Compliance	Comments / Finding Details
12.1.1 Does the facility have a written emergency preparedness plan to handle natural disasters, fire emergencies, and industrial accidents?	Yes	Document Number: RBA-QP-19; Date of issue: Jan 02, 2024.
12.1.2 Does the facility have a written fire prevention policy?	Yes	Document Number: RBA-QP-16; Date of issue: Jan 02, 2024.
12.1.3 Are employees trained on emergency preparedness and fire prevention?	Yes	The latest training date: Apr 13, 2026; Department: All departments.
Part 12.2 Emergency Response Personnel	Compliance	Comments / Finding Details
12.2.1 Have sufficient Emergency Response Personnel been designated and trained to administer the fire prevention procedures and emergency preparedness plans? [Critical] No trained emergency response personnel [Major] Insufficient no. of Emergency Response Personnel / they cannot be easily recognized	Yes	Number of trained emergency response personnel per shift & per floor: at least 2 per shift & 1 per floor; The latest training date: Apr 13, 2026.
Part 12.3 Fire Acceptance Certificate	Compliance	Comments / Finding Details
12.3.1 Does the facility have their fire safety system adequately inspected by a qualified entity according to the validity of their Fire Acceptance Certificate? [Critical] Invalid or missing Fire Acceptance Certificate and inadequate or missing fire safety system inspection [Major] Valid Fire Acceptance Certificate and inadequate or missing fire safety system inspection	Yes	When did the full compound built? 2001 External inspection entity: Guangzhou Guohua Fire Testing Technical Co., Ltd; Frequency of external inspection: Annually; The latest date of inspection: Oct 31, 2025; Inspection content: Fire alarm, fire hydrants, fire extinguishers, emergency light, exit sign, etc. Inspection result: Acceptable.
Part 12.4 Exit and Evacuation	Compliance	Comments / Finding Details

12.4.1 *Are emergency exits and evacuation paths built in line with legal requirements?	Yes	
12.4.2 *Are emergency exits and evacuation paths clearly marked, and illuminated? [Major] Insufficient inspections	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
12.4.3 *Are emergency exits and evacuation paths clear from obstruction? [Major] Insufficient inspections	Yes	Frequency of inspection: Daily; The latest date of inspection: May 19, 2026.
12.4.4 Are non-emergency exits marked appropriately?	Yes	
12.4.5 Are emergency lights installed in line with legal requirements?	Yes	
12.4.6 Are all emergency lights installed functional? [Major] Insufficient inspections	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
12.4.7 *Are emergency exit doors appropriate, operable and can be opened with a single motion?	Yes	
12.4.8 Are evacuation floor plans with required information posted?	Yes	
Part 12.5 Fire Fighting System	Compliance	Comments / Finding Details
12.5.1 Is the number of functional and appropriate fire extinguishers in line with legal requirements?	Yes	
12.5.2 Are fire extinguishers properly installed?	Yes	
12.5.3 Are fire extinguishers clear from obstruction?	Yes	
12.5.4 *Are fire extinguishers fully charged and inspected monthly?	Yes	Frequency of inspection: Monthly; Date of the latest inspection: May 06, 2026.
12.5.5 Is the sprinkler and fire hydrant system functional?	Yes	
12.5.6 Is the sprinkler and fire hydrant system clear from obstructions?	Yes	
12.5.7 Is the sprinkler and fire hydrant system inspected monthly?	Yes	Frequency of inspection: Monthly; Date of the latest inspection: May 06, 2026.
12.5.8 Is the water supply adequate for fire hydrant or sprinkler system?	Yes	
12.5.9 Are emergency response personnel trained on the proper usage of firefighting equipment?	Yes	Frequency of the training: Twice per year; Date of the latest training: Apr 13, 2026; Names of the trained department and number of the trained workers: All departments and 12.
Part 12.6 Alert System	Compliance	Comments / Finding Details
12.6.1 Is a functional emergency alarm system installed appropriately?	Yes	
12.6.2 Are emergency alarm system switches/control panels free from obstruction?	Yes	
12.6.3 Is the installed alarm system inspected and tested monthly?	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
Part 12.7 Emergency Drills	Compliance	Comments / Finding Details
12.7.1 *Does the facility conduct sufficient emergency evacuation drills in line with legal and ESCP requirements?	Yes	Frequency of the drill: twice per year. Videos for all fire drills were provided for review. Production area: Latest fire drill on day time: Apr 13, 2026; Planed participant percentage: 100%; Actual participant percentage: 100%; Reason for absent: N/A; Onsite participation rate: 100%; Evacuation Time: 2 minutes and 30 seconds. Latest fire drill on night time: Apr 13, 2026; Planed participant percentage: 100%; Actual participant percentage: 100%; Reason for absent: N/A; Onsite participation rate: 100%; Evacuation Time: 2 minutes and 15 seconds. Dormitory area: Latest fire drill: Apr 13, 2026; Planed participant percentage: 100%; Actual participant percentage: 100%; Reason for absent: N/A; Onsite participation rate: 100%; Evacuation Time: 2 minutes.
12.7.2 Does the facility plan additional fire drills where required?	N/A	Additional fire drill was not required in the factory.
Part 12.8 Electrics	Compliance	Comments / Finding Details
12.8.1 Is electrical wiring properly maintained, covered/insulated?	Yes	
12.8.2 Are electrical wires properly attached?	Yes	
12.8.3 Are electrical panels and junction boxes enclosed and readily accessible?	Yes	

12.8.4 Is the electrical system maintained by qualified personnel?	Yes	Number of qualified electricians: 1; Date of the latest maintenance: May 06, 2026.
Part 12.9 Flammable and Combustible Hazards	Compliance	Comments / Finding Details
12.9.1 Are work areas free of excessive flammable/combustible materials?	Yes	
12.9.2 Are floors kept clean from spillages and materials?	Yes	
12.9.3 Is flammable/combustible waste properly managed and removed from the work area promptly?	Yes	
12.9.4 Are flammable/combustible materials kept away from open flames or possible sources of ignition?	Yes	
12.9.5 Are areas for flammable/combustible dust-producing operations properly designed and maintained?	Yes	
12.9.6 Are areas for paint related operations properly designed and maintained?	Yes	Spray residue, ducts and filters cleaning frequency: Weekly; The latest cleaning date: May 13, 2026.
12.9.7 *Is adequate local ventilation present during spraying operations?	Yes	Velocity measurement frequency, measurement result: Weekly and 1.7-2.2 m/s; Filter cleaning frequency: Weekly.
12.9.8 Is adequate overall ventilation provided where chemicals and pollutants (e.g., solvents, solder, and dust) are used?	Yes	
12.9.9 Are personnel properly trained on the handling and use of flammable/combustible materials?	Yes	Date of the latest training: Apr 23, 2026; Departments: All departments.
Part 12.10 Smoking Rules	Compliance	Comments / Finding Details
12.10.1 Are smoking rules in line with legal requirements?	Yes	Non-smoking areas: The whole production workshops and warehouses. Designated smoking areas: Designated smoking areas beside the dormitory building.
12.10.2 Are smoking rules followed?	Yes	
Part 12.12 Emergency Investigation & Reporting	Compliance	Comments / Finding Details
12.12.1 Are emergencies investigated to determine root causes and examined to prevent a recurrence?	N/A	No major incidents or emergencies happened in the factory.
12.12.2 Are major facility incidents and emergencies reported to ESCP within 48 hours?	N/A	No major incidents or emergencies happened in the factory.
13. E, H & S (EHS)		
Part 13.1 EHS Program	Compliance	Comments / Finding Details
13.1.1 Does the facility have an updated and effective Environmental, Health and Safety (EHS) program?	Yes	Document Number: RBA-QM-01; Date of issue: Jan 02, 2024.
13.1.2 Does the facility promote workplace EHS awareness?	Yes	Detail the EHS promotion activities: EHS meeting, EHS training etc.
13.1.3 Are new materials and operations with potential EHS hazards controlled?	Yes	Document Number: RBA-QP-25; Date of issue: Jan 02, 2024; Date of Last Assessment: Mar 05, 2026.
Part 13.2 Training	Compliance	Comments / Finding Details
13.2.1 *Are workers trained on the contents in the EHS program? [Critical] > 20% of sampled workers have not been trained / unaware of training content [Major] ≤ 20% of sampled workers have not been trained / unaware of training content	Yes	The most recently trained department and training date: Packing department and Apr 28, 2026.
13.2.2 Are contractors given site specific training on EHS rules?	Yes	Date of latest training: May 05, 2026.
Part 13.3 EHS Committee	Compliance	Comments / Finding Details
13.3.1 Does the facility have a designated qualified EHS coordinator?	Yes	The number of qualified EHS coordinator: 1.
13.3.2 *Does the facility have an EHS committee/team?	Yes	EHS committee meeting frequency and the latest meeting date: Once per 2 months and May 08, 2026.
13.3.3 Are workers given the opportunity to voice EHS opinions and concerns?	Yes	
Part 13.4 Occupational Health	Compliance	Comments / Finding Details
13.4.1 Are occupational health checks provided to applicable workers?	Yes	The departments that the occupational health checks must be provided: Crushing, mixing, spraying painting, tempo printing, assembly with hazardous chemicals.
13.4.2 Are workers' exposure levels towards hazardous substances maintained as required with test reports for verification?	Yes	Date of test and the test lab name: Jan 07, 2026 and Guangdong Anyuandingsheng Testing Evaluation Technology Co., Ltd.
13.4.3 Does the facility have a bloodborne pathogen policy?	Yes	Document Number: RBA-QP-26; Date of issue: Jan 02, 2024.
13.4.4 Are workers trained on bloodborne pathogens?	Yes	The latest training date and attendees: Sep 11, 2025 and all workers.
Part 13.5 Personal Protective Equipment (PPE)	Compliance	Comments / Finding Details
13.5.1 Has a hazard assessment been completed which identifies the appropriate Personal Protective Equipment (PPE) required for each operation?	Yes	List 3 major risks and the corresponding PPE: 1) Noise and earplugs; 2) chemicals and active carbon masks; 3) dust and anti-dust masks.
13.5.2 Is appropriate signage posted in all areas where Personal Protective Equipment (PPE) must be worn?	Yes	

13.5.3 *Are workers provided with appropriate Personal Protective Equipment (PPE) free of charge according to the listed operational hazard assessments? [Critical] Workers are not provided with PPE free of charge [Major] The type of PPE provided is incorrect	Yes	
13.5.4 Have applicable workers been trained on the proper use, cleaning and storage of Personal Protective Equipment (PPE)?	Yes	Awareness of the interviewed workers using PPE: good.
13.5.5 *Are Personal Protective Equipment (PPE) being properly used?	Yes	
Part 13.6 Workplace Safety	Compliance	Comments / Finding Details
13.6.1 Are stairs provided with railings in line with legal requirements?	Yes	
13.6.2 Are open sides of all platforms, stairs, and floors equipped with railings in line with legal requirements?	Yes	
13.6.3 Are elevated platforms secured to lifting devices (i.e. forklifts or high lifts)?	Yes	
13.6.4 Are floor and roof openings covered or protected to prevent falls?	Yes	
13.6.5 Are all ladders used in the facility in good condition?	Yes	
13.6.6 Are confined spaces identified and secured from unauthorized entry? [Critical] Unauthorized entry [Major] Missing signage / not locked or secured	Yes	
13.6.7 Are workers who enter confined spaced trained?	Yes	The most recently trained department and training date: All departments and Mar 05, 2026.
Part 13.7 Machinery Safety	Compliance	Comments / Finding Details
13.7.1 Does the facility have a written procedure for the control of hazardous energy lockout and tagout?	Yes	Document Number: RBA-W-01-19; Date of issue: Jan 02, 2024.
13.7.2 Are sufficient lockout and tagout devices available, and used prior to service or maintenance?	Yes	
13.7.3 Are workers trained by qualified trainers prior to working on hazardous energy related operations?	Yes	Awareness of the interviewed maintenance staff towards the lockout & tag out procedure: good.
13.7.4 Are loose clothing, jewelry, and exposed long hair prohibited near moving machinery?	Yes	
13.7.5 *Are machine safeguards provided for all machines and operating points that may potentially cause serious injury?	Yes	
13.7.6 Are adequate start/stop controls and protection systems manageable by the operator? [Critical] Missing system / system doesn't work [Major] Missing label	Yes	
13.7.7 Are machines, equipment and fixtures inspected frequently and in safe operating condition?	Yes	
13.7.8 Have workers been trained on the subject of machine safety?	Yes	The most recently trained department and training date: Injection molding department and Dec 23, 2025.
13.7.9 Are maintenance and inspection records for all machines available?	Yes	Frequency of maintenance and inspection: Daily; The latest date of maintenance and inspection: May 19, 2026.
Part 13.8 Equipment Safety	Compliance	Comments / Finding Details
13.8.1 Are inspections conducted on cranes, hoists, slings, lifts and forklifts regularly?	Yes	Elevator: 1 set; Date of last inspection and inspection department: Jun 10, 2025 and Guangdong Special Appliance Inspection Institute Dongguan Branch.
13.8.2 Are cranes, hoists, slings, lifts and forklifts in good condition?	Yes	
13.8.3 Are capacity limits clearly marked on cranes, slings, hoists and lifts?	Yes	Maximum load limits of elevator: 2 tons.
13.8.4 Are all crane, hoist, slings, lifts and forklifts operators trained and with valid operating licenses? [Major] Absence of operator license [Minor] Absence of internal training	Yes	The number of operators with valid operating licenses: 1 management staff.
13.8.5 Have all boilers, unfired pressure vessels, and furnaces been professionally inspected?	N/A	There were 4 air compressors in the factory, and it was less than 1.6MPa & 1L, so no inspection was required. No boiler was used by the factory.
13.8.6 Are boilers, unfired pressure vessels, and furnaces inspected monthly?	Yes	Date of latest inspection: May 19, 2026.
Part 13.9 Hot-Work and Gas Cylinders	Compliance	Comments / Finding Details
13.9.1 Does the facility have a written hot-work process policy?	Yes	Document Number: RBA-W-01-20; Date of issue: Jan 02, 2024.
13.9.2 Are hot-work processes implemented and monitored properly?	N/A	No hot-work was available in the past year in the factory.
13.9.3 Are hot-work operators trained and certified?	N/A	No hot-work was available in the past year in the factory.

13.9.4 Are gas cylinders properly marked, used, stored and secured?	Yes	
13.9.5 Are gas cylinder operators trained?	Yes	The most recently training date: May 14, 2026.
13.9.6 Are gas cylinders inspected monthly?	Yes	Date of latest inspection: May 19, 2026.
Part 13.10 Chemical Safety	Compliance	Comments / Finding Details
13.10.1 Is a full list of in-house hazardous chemicals kept and managed by the EHS coordinator or facility manager?	Yes	
13.10.2 Are up-to-date Material Safety Data Sheets (MSDS) for all chemicals available in the local legal language?	Yes	Name of the highest consumption chemicals: Glue, thinner, paint, cleaner, etc.
13.10.3 Are up-to-date Material Safety Data Sheets (MSDS) with complete information available for all chemicals?	Yes	
13.10.4 Are all chemicals stored in proper containers, with the contents and hazard warnings labeled (where applicable) in the local legal language?	Yes	
13.10.5 Are chemicals containers properly stored in metal safety cabinets and/or in proper storage rooms?	Yes	
13.10.6 Are the containers for chemicals properly grounded?	Yes	
13.10.7 Is secondary containment used in work areas for bulk liquid chemical storage?	Major	[Non-Compliance]: No secondary containment was available for about 50% chemicals used in the factory. Such as, one bucket of cleanser used in dust-free workshop on 2/F of production building A, all chemicals stored in spraying painting workshop on 1/F of production building B.
13.10.8 Is the size of the secondary containment adequately larger than that of the individual container?	Yes	
13.10.9 Is storage and processing used for chemicals labeled or color-coded?	Yes	
13.10.10 Are functional emergency eyewash equipment and showers provided where workers come into contact with corrosive chemicals or high volumes of solvents? [Critical] Missing eyewash equipment or shower [Major] Malfunctioning or mislocated eyewash equipment or shower	Yes	
13.10.11 Are emergency eyewash equipment and showers indicated with signs and regularly inspected?	Yes	Date of latest inspection: May 19, 2026.
13.10.12 Have workers been trained on chemical safety?	Yes	The most recently trained department and training date: All departments and Dec 23, 2025.
Part 13.11 Incident Investigation and Reporting	Compliance	Comments / Finding Details
13.11.1 Are reporting procedures for accidents and near misses in practice?	Yes	Document Number: RBA-QP-21; Date of issue: Jan 02, 2024.
13.11.2 Are all accidents and near misses investigated? [Critical] > 3 accidents not investigated / actions not taken [Major] ≤ 3 accidents not investigated / actions not taken	N/A	No accident happened in the past year in the factory.
13.11.3 Are workers free to report accidents without punitive actions?	Yes	
13.11.4 Does the facility keep records for all accidents, near misses and illness?	Yes	
Part 13.12 Environmental	Compliance	Comments / Finding Details
13.12.1 *Is indoor and outdoor hazardous waste stored properly?	Yes	
13.12.2 *Is indoor and outdoor hazardous waste storage inspected on a weekly basis?	Yes	
13.12.3 Is industrial waste water discharged properly?	N/A	No wastewater was discharged from the factory.
13.12.4 Is domestic waste water discharged properly?	Yes	
13.12.5 Are air pollution control systems properly maintained and operated?	Yes	
13.12.6 Is air discharged properly?	Yes	Date of latest inspection: Sep 03, 2025; Name of the inspection entity: Waltek Testing Group HCT (Shenzhen) Co., Ltd.; Name of the permit issuing authority and the issue date (if applicable): Local Environmental authorities and Nov 05, 2025 (Valid for 5 years).
13.12.7 Is all hazardous waste disposed of properly?	Yes	Name of collector: Zhuhai Doumen Yongsheng Environmental Protection Industrial Waste Recovery Treatment Co., Ltd; Contract period: Feb 01, 2026 to Jan 31, 2027; The latest manifest date: May 13, 2026.
13.12.8 Are storage tanks properly managed?	N/A	No such equipment was used in the factory.
13.12.9 Are workers involved in hazardous waste management trained?	Yes	The most recently training date: Dec 23, 2025.
14. Dormitory & Canteen		
Part 14.1 Facility	Compliance	Comments / Finding Details
14.1.1 *Are dormitory and childcare facilities located in a separate non-industrial facility?	Yes	

14.1.2 Is the maximum number of workers per room limited to 8?	Yes	
14.1.3 Does each worker have sufficient living space and a secure locker in the dormitory? [Critical] Inadequate bed provided [Major] Insufficient space / Lack of locker	Yes	
14.1.4 Are there adequate toilet and shower facilities?	Yes	Ratio of shower facilities and toilet (per room): 1:1. About 5-6 workers lived per room.
14.1.5 Are there adequate recreation facilities?	Yes	
14.1.6 *Are dormitories kept clean and maintained in good condition?	Yes	
14.1.7 Are residents and guests well informed of the written dormitory rules?	Yes	
14.1.8 Are privacy and gender respected with segregation for dormitory rooms, toilets, and showers?	Yes	
14.1.9 Are security measures taken to protect workers and their property?	Yes	
14.1.10 Is trash properly disposed of in dormitory facilities?	Yes	Frequency of removal: Daily; Date of latest removal: May 19, 2026.
Part 14.2 Emergency Preparedness Policy	Compliance	Comments / Finding Details
14.2.1 Does the facility have a written emergency preparedness plan for dormitory area to handle natural disasters and fire emergencies?	Yes	Document Number: RBA-QP-19; Date of issue: Jan 02, 2024.
14.2.2 Does dormitory have a written fire prevention policy?	Yes	Document Number: RBA-QP-16; Date of issue: Jan 02, 2024.
14.2.3 Are residents and dormitory personnel trained on emergency preparedness and fire prevention?	Yes	The latest training date: Apr 13, 2026.
Part 14.3 Exit and Evacuation	Compliance	Comments / Finding Details
14.3.1 *Are emergency exits and evacuation paths built in line with legal requirements?	Yes	
14.3.2 *Are emergency exits and evacuation paths clearly marked, and illuminated? [Major] Insufficient inspections	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
14.3.3 *Are emergency exits and evacuation paths clear from obstruction? [Major] Insufficient inspections	Yes	Frequency of inspection: Daily; The latest date of inspection: May 19, 2026.
14.3.4 Are emergency lights installed in line with legal requirements?	Yes	
14.3.5 Are all emergency lights installed functional? [Major] Insufficient inspections	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
14.3.6 *Are emergency exit doors appropriate, operable and can be opened with a single motion?	Yes	
14.3.7 Are evacuation floor plans with required information posted?	Yes	
Part 14.4 Fire Fighting System	Compliance	Comments / Finding Details
14.4.1 Is the number of functional and appropriate fire extinguishers in line with legal requirements?	Yes	
14.4.2 Are fire extinguishers properly installed?	Yes	
14.4.3 Are fire extinguishers clear from obstruction?	Yes	
14.4.4 *Are fire extinguishers fully charged and inspected monthly?	Yes	Frequency of inspection: Monthly; Date of the latest inspection: May 06, 2026.
14.4.5 Is the sprinkler and fire hydrant system functional?	Yes	
14.4.6 Is the sprinkler and fire hydrant system clear from obstructions?	Yes	
14.4.7 Is the sprinkler and fire hydrant system inspected monthly?	Yes	Frequency of inspection: Monthly; Date of the latest inspection: May 06, 2026.
14.4.8 Is water supply adequate for fire hydrant or sprinkler system?	Yes	
Part 14.5 Emergency Alert System	Compliance	Comments / Finding Details
14.5.1 Is a functional emergency alarm system installed appropriately?	Yes	
14.5.2 Are emergency alarm system switches/control panels free from obstruction?	Yes	
14.5.3 Is the installed alarm system inspected and tested monthly?	Yes	Frequency of inspection: Monthly; The latest date of inspection: May 06, 2026.
Part 14.6 Canteen	Compliance	Comments / Finding Details
14.6.1 Do catering services meet legal requirements?	Yes	License number: JY34419164188937; Valid date: Mar 29, 2028.
14.6.2 Are catering service areas kept clean and hygienic?	Yes	
14.6.3 Are food storage methods and controls adequate?	Yes	
14.6.4 Is trash properly managed?	Yes	Frequency of removal: Daily; Date of latest removal: May 19, 2026.

14.6.5 Is there a system in place to ensure that food handlers are in good health and well trained?	Yes	Frequency of health check and name of check organization: Annually and Dongguan Youhua Hospital; Number of Food handlers: 3; Number of health certification: 3; The latest training date: Apr 12, 2026.
Part 15.1 Work Hour DetailsPart	Compliance	Comments / Finding Details

Section 3: Photos



0.01 Factory gate



0.02 Factory nameplate



0.03 Production building



0.04 Raw material warehouse



0.05 Injection molding_day shift



0.06 Injection molding_night shift



0.07 Tempo printing



0.08 Spraying painting



0.09 Assembly and packing



0.10 Finished goods warehouse



0.11 Dormitory building



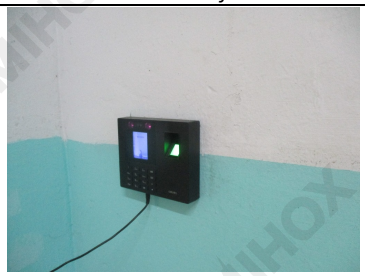
0.12 Dormitory room



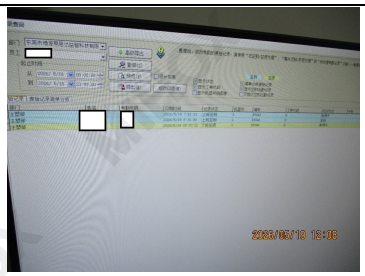
0.13 Canteen



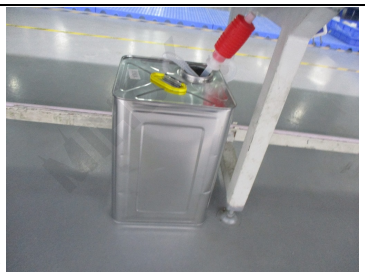
0.14 Kitchen



0.15 Attendance record machine



0.16 Electronic attendance system



13.10.7-A



13.10.7-B

Disclaimer:
Always verify the authenticity of any Ethical Supply Chain Program Audit Report.
Ethical Supply Chain Program Members can verify by using their Connect account.
For information on how to verify Audit Reports, contact us at info@ethicalsupplychain.org
In 2024, the ICTI Ethical Toy Program, formerly ICTI CARE Process, became the Ethical Supply Chain Program. Find out more at www.ethicalsupplychain.org