

Responsible Business Alliance

Customer Managed Audit

Audit Reference Number	JSASCN24128122		
Audited Facility	Zhuhai Longyu Technology Co., LTD		
Audit Date	Sep.5,2024	to	Sep.6,2024
Overall Score	144		

Conformance Results

Overall Score	Conformance	Risk of NC	Minor NC	Major NC	Priority NC	Opportunity for Improvement	Total Scored Questions	Not Applicable Questions
144	80	0	0	9	0	0	91	2

Audit Information	
Audit Reference Number	JSASCN24128122
Audit Start Date	Sep.5,2024
Closing Meeting Date	Sep.6,2024
Audit Type	Initial
Audit Firm	SGS
Audit Category	CMA
Auditor	Auditor-627/Auditor-631

Factory Information	
Company Name	Zhuhai Longyu Technology Co., LTD
Facility Name	Zhuhai Longyu Technology Co., LTD
Facility Address	Zhuhai Longyu Technology Industrial Park, Chancheng 1st Road, Qianwu Town, Doumen District, Zhuhai City, Guangdong Province
Facility Country	China
Facility Point Of Contact	Quality Department Engineer
Total Number Of Workers	0

Executive Summary

The audit of Zhuhai Longyu Technology Co., LTD evaluates the facility's labor, ethics, occupational health & safety and environmental practices, and supply chain systems against the RBA audit 8.0.0 criteria as contained in the RBA audit protocol and applicable laws and regulations. The audit takes place on Sep.5-6, 2024. 2 RBA auditors spend a total of 4 person-days onsite. No integrity issues are encountered. The audit findings are according to objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. The findings include 0 priority Non-conformance, 9 major Non-conformance and 0 minor Non-conformance against the audit criteria.

Summary of Priority Findings:

Nil

Summary of major finding:

A1.2 1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards.
2.It written 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. But both labor contracts are kept in factory office without providing for workers.
3.Unreasonable item in labor contact: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary.

A3.1 Overtime working hours exceed local law requirement. The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The highest weekly working hours are 60 h/workweek. The maximum overtime hours are 2 h/ day and 92 h/month.

a) 97.2% of workers do not meet local law regarding maximum monthly overtime.

- a.a) Average = 97.2% with a highest of 92 h/month.
a.b) Oct. 2023 (random month) = 100% with a highest of 78 h/month
a.c) Mar. 2024 (random month) = 92% with a highest of 92 h/month
a.d) Jul. 2024 (average month) = 100% with a highest of 86 h/month.

A.M.2.2 1.The Employee Manual (Date: May 1, 2023) is not updated in time, it lacks of below content: childcare leave and nursing leave.

2.Unreasonable items in the Employee Manual (Date: May 1, 2023), it does not set up lawful& reasonable items per legal requirement:

Article 3.4.1 The one who resign within 1 year would be deducted working suits fee, RMB35/ pcs for summer suit and RMB50/ pcs for winter suit, and the factory would take back the working suit at the same time...The one who resign within 1 year would be deducted working shoes fee (RMB20/ pair).

3. The working hours management system is not effectively implemented, it does not in line with <Working Hours Policy>.

B1.1 The factory does not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building.

B1.2 2 out of 2 board cutting workers does not wear ear-plug during operation. 4 out of 4 workers in solder mask workshop wear hygienic masks, instead of active carbon masks. One worker worked in silk print workshop does not wear active carbon mask. Based on interview, the factory provided ear-plugs and active carbon masks. But the workers do not wear PPEs because of PPEs are uncomfortable.

B2.3 1) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. 2) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.

B.M.3.1 3 out of 3 hazardous chemical sub-containers do not mark with safety label. The acetone in ink mixing room does not mark with safety label.

C6.1 Energy consumption and all scopes 1, 2, Greenhouse gas (GHG) emissions are tracked, documented, and publicly reported against an absolute corporate-wide GHG reduction goal. However, the significant scope 3 category 1 are not tracked, documented.

E4.4 The factory does not ensure suppliers' RBA Code implementation performance and continuous improvement.

Summary of Minor Findings:
Nil

Audit Score by Section

Section	Section Score	Conformance	Risk Of NC	Minor of NC	Major of NC	Priority of NC	Opportunity for Improvement	Total scored questions	Non applicable questions
A) Labor	166	22	0	0	3	0	0	27	2
B) Health & Safety	151	20	0	0	4	0	0	24	0
C) Environment	184	16	0	0	1	0	0	17	0
D) Ethics	200	16	0	0	0	0	0	16	0
E) Supply Chain	167	6	0	0	1	0	0	7	0

Non-Conformance Findings Details

Question #	Subsection Name	Question Text	Rating	Conclusion

Full List of Questionnaire Results

A) Labor

A1) PROHIBITION OF FORCED LABOR

Question #	VAP-A1.1
Question Text	Forced labor in any form, including but not limited to bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons, is not permitted.
Rating	Conformance
Conclusion	Forced labor in any form, including bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons, is not permitted.
Data Points	<p>Data point 1: Site observation: There are no visible restrictions with regard to freedom of movement within the site or to leave the site.</p> <p>Data point 2: Record review: Prohibition of Forced Labor Management Procedure ((Doc. No: LY-RBA-COP003, Rev. 0/1, Issue date: November 10, 2023)) stipulates that the facility prohibits and not support to use any form, including bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons.</p> <p>Data point 3: Record review: 24 out of 24 Personnel files reveal that a) no fees or penalties is implemented b) all allowable fees and penalties are disclosed c) no fee is required during recruitment for new employees. d) no pre-job health check is needed.</p> <p>Data point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data point 5: Workers interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A1.2
Question Text	Terms and conditions of employment are provided in writing and in their native language, or a language the worker can understand, before employment (foreign and internal migrant workers: before leaving their home country/region) and the key terms and conditions of employment are explained verbally in a language workers can understand, so workers understand what the terms and conditions of employment state.
Rating	Major Non-Conformance
Conclusion	<p>1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards.</p> <p>2.It written 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. But both labor contracts are kept in factory office without providing for workers.</p> <p>3.Unreasonable item in labor contract: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary.</p>
Data Points	<p>Data Point 1: Record review:</p> <p>1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards.</p> <p>2.It written 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. But both labor contracts are kept in factory office without providing for workers.</p> <p>3.Unreasonable item in labor contract: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary.</p> <p>Data Point 2: Record review: No foreign migrant worker is recruited.</p> <p>Data Point 3: Management interview: HR Manager confirms:</p> <p>1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards.</p> <p>2.There are three labor contracts sign by worker& factory (1 for worker, 1 for local labor bureau, 1 kept by the factory) before, but it writes 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. So the actual number of signed labor contracts is different with the one written in labor contract. And they will update the content in labor contract in future.</p> <p>3.Unreasonable item in labor contract: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary. And there is no deduction case of urgent resignation occurred before.</p> <p>Data point 4: Workers interview: 24 out of 24 workers confirm they do not remember the content in labor contract, and 10 confirm they do not get labor contact after signing, and all confirm no deduction case of urgent resignation is occurred.</p> <p>Legal references: Labor Contract Law of the People's Republic of China (2012 Amendment), Article 17 A labor contract shall include the following clauses:</p> <p>3. The time limit for the labor contract.</p> <p>4. The job descriptions and work locations.</p> <p>6. The remuneration.</p> <p>8. The labor protection, working conditions and protection against occupational hazards</p>

	Supporting evidence reference(s): Labor contracts
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Question #	VAP-A1.3
Question Text	The worker's government-issued identification and personal documentation originals are not held by their employer, agents and sub-agents.
Rating	Conformance
Conclusion	The worker's government-issued identification and personal documentation originals are not held by the employer. No agent or sub-agent is used.
Data Points	<p>Data Point 1: Site observation: a) Workers can demonstrate where personal records are kept securely b) Workers maintain possession or control over their identification record.</p> <p>Data Point 2: Record review: 24 out of 24 Personnel files demonstrate a) No originals of workers' personal documentation is kept b) Original documents are not to be tampered with or damaged in any way c) No fee for the safekeeping of government-issued identification, passports or work permits.</p> <p>Data Point 3: Management interview: The worker's government-issued identification and personal documentation originals are not held by the employer. No agent or sub-agent is used.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers (no foreign migrant worker is recruited) confirm they keep the government-issued identification and personal documentation originals themselves. And they get the job themselves without any agent or sub-agent.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

A2) YOUNG WORKERS

Question #	VAP-A2.1
Question Text	Workers are not below the minimum age
Rating	Conformance
Conclusion	Workers are not below the minimum age. The youngest worker is 18 years old.
Data Points	<p>Data Point 1: Site observation: No identification of workers on-site under the minimum age.</p> <p>Data Point 2: Record review: 24 out of 24 personnel files reveal all workers are above the minimum age or above the facility policy minimum age. The youngest worker is 18 years old, who is born on Mar.17, 2006, and joined in the facility on Mar.19, 2024.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A2.2
Question Text	Workers under the age of 18 are not allowed to perform work that is likely to jeopardize the health or safety of these young workers, including night work or overtime.
Rating	Not Applicable
Conclusion	No workers under age 18 on site.
Data Points	<p>Data Point 1: Record review: 24 out of 24 Personnel files reveal all workers are more than 18 years old. The youngest one is 18 years old, who is born on Mar.17, 2006, and joined in the facility on Mar.19, 2024.</p> <p>Data Point 2: Record review: Employee roster (Update date: Aug.30, 2024) shows that all workers are more than 18 years old.</p> <p>Data Point 3: Management interview: HR Manager confirms no workers under age 18 on site</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A2.3
Question Text	Apprentice/Intern/Student Worker employment conforms with learning objectives.
Rating	Not Applicable
Conclusion	No apprentice/ intern/ student workers work in the facility.

Data Points	Data Point 1: Record review: 24 out of 24 Personnel files reveal no apprentice/ intern/ student workers work in the facility.
	Data Point 2: Management interview: HR Manager confirms the audit observations.
	Data Point 3: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

A3) WORKING HOURS

Question #	VAP-A3.1
Question Text	Hours worked in a workweek does not exceed 60 hours.
Rating	Major Non-Conformance
Conclusion	<p>Overtime working hours exceed local law requirement. The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The highest weekly working hours are 60 h/workweek. The maximum overtime hours are 2 h/ day and 92 h/month.</p> <p>a) 97.2% of workers do not meet local law regarding maximum monthly overtime.</p> <p>a.a) Average = 97.2% with a highest of 92 h/month.</p> <p>a.b) Oct. 2023 (random month) = 100% with a highest of 78 h/month</p> <p>a.c) Mar. 2024 (random month) = 92% with a highest of 92 h/month</p> <p>a.d) Jul. 2024 (average month) = 100% with a highest of 86 h/month.</p>
Data Points	<p>Data Point 1: Site observation: The facility uses face scan attendance machine to record and confirm workers' working time, and time recording devices are present, and all are in good condition.</p> <p>Data Point 2: Record review: Workers' monthly overtime hours exceed 36 hours. The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The highest weekly working hours are 60 h/workweek. The maximum overtime hours are 2 h/ day and 92 h/month.</p> <p>a) 97.2% of workers do not meet local law regarding maximum monthly overtime.</p> <p>a.a) Average = 97.2% with a highest of 92 h/month.</p> <p>a.b) Oct. 2023 (random month) = 100% with a highest of 78 h/month</p> <p>a.c) Mar. 2024 (random month) = 92% with a highest of 92 h/month</p> <p>a.d) Jul. 2024 (average month) = 100% with a highest of 86 h/month.</p> <p>Data Point 3: Record review: No Consolidated Working Hours System Approvals or any other alternative working hours system obtain.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: Labor Law of the People's Republic of China (2018 Amendment), Article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty six hours.</p> <p>Supporting evidence reference(s): RBA Working Hours Collection Template</p>

Question #	VAP-A3.2
Question Text	Workers receive at least one (1) day off every seven (7) days
Rating	Conformance
Conclusion	Workers receive at least 1 day off every 7 days. The max. continuous working days are 6 days.
Data Points	<p>Data Point 1: Record review: The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The max. continuous working days are 6 days, workers usually rest on Sunday.</p> <p>Data Point 2: Record review: 12 out of 12 production records covering Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) confirm time recording device records work and record accurately and are preventatively maintained.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A3.3
Question Text	Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave
Rating	Conformance
Conclusion	Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave.

Data Points	Data Point 1: Site observation: Workers take mandatory breaks, which include at least one meal break per shift. Data Point 2: Record review: 12 out of 12 leave records covering the period Aug. 2023 to Aug. 2024 demonstrate: a) Actual leaves and holidays are recorded, securely kept and are accurate b) Leave records are consistent with the medical certificates. Data Point 3: Management interview: HR Manager confirms the audit observations. Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations. Legal references: NA Supporting evidence reference(s): NA
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A4) WAGES AND BENEFITS

Question #	VAP-A4.1
Question Text	Wages for regular and overtime hours are meeting "equal pay for equal work and qualification", correctly calculated, and paid timely to all workers.
Rating	Conformance
Conclusion	Wages for regular and overtime hours are meeting "equal pay for equal work and qualification", correctly calculated, and paid timely to all workers.
Data Points	<p>Data Point 1: Record review: 24 out of 24 payroll records covering the period of Aug. 2023 to Jul. 2024 demonstrate a) "equal pay for equal work and qualification" applies b) "Pay equals time worked" applies; this means any facility-required activity. c) All workers shall be paid no less than the agreed* wage for all regular hours. d) Overtime and other compensation and benefits are paid and are on top of the agreed wage for regular hours (RMB2400/ month). e) Payment made to leavers (resigned workers) is in compliance. f) Wages, benefits, and overtime are correctly calculated (150%, 200%, 300% of regular working hours when OT on weekday, weekend, statutory holiday) and accurate pay records are maintained. g) Wages are paid directly to workers (at the end of next month by bank) with no unauthorized deductions (including for disciplinary measures) in a timely manner. h) Recurring pay (including overtime and other) is not delayed more than two days after the agreed timing for payment. i) maternity or sick leave absences do not incur a financial penalty. j) Wage records are accurate. k) No deductions or payment for PPE. l) No learners are present.</p> <p>Data Point 2: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 3: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A4.2
Question Text	For each pay period, workers are provided with understandable wage statements that include sufficient information to verify accurately work performed.
Rating	Conformance
Conclusion	For each pay period, workers are provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed.
Data Points	<p>Data Point 1: Record review: 24 out of 24 payroll slips covering the period of Aug. 2023 to Jul. 2024 demonstrate a) Workers are provided with payroll slips that clearly indicate compensation (before payment), including: a.a) Regular hours a.b) Overtime hours a.c) Overtime compensation levels a.d) No disciplinary deductions a.e) Details of the deductions a.e.a) Insurance contributions a.e.b) Employer a.e.c) Worker contributions b) Pay slip records are accurate.</p> <p>Data Point 2: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 3: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A4.3
Question Text	Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame.
Rating	Conformance
Conclusion	Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame.
Data Points	<p>Data Point 1: Record review: 24 out of 24 payroll records covering the period of Aug. 2023 to Jul. 2024 demonstrate a) Calculations: employer contributions to worker insurance schemes (unemployment, retirement, medical, accident, childbearing) are available on a monthly basis that: b) Allows for analysis by individual worker c) Total per contribution type.</p> <p>Data Point 2: Record review: Social insurance records covering the period of Aug. 2023 to Aug. 2024 show that 100% employees are provided with retirement, unemployment, medical, accident and maternity insurances.</p> <p>Data Point 3: Record review: Housing fund records covering the period of Aug. 2023 to Aug. 2024 show that 100% employees are provided with housing fund.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 20 out of 20 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

A5) NON-DISCRIMINATION / NON-HARASSMENT / HUMANE TREATMENT

Question #	VAP-A5.1
Question Text	No evidence of discrimination, harassment, inhumane treatment, or threat of these exists.
Rating	Conformance
Conclusion	No evidence of discrimination, harassment, inhumane treatment, or threat of these exists.
Data Points	<p>Data Point 1: Site observation: No identification of possible instances of discrimination, harassment, inhumane treatment, or threat of these exists.</p> <p>Data Point 2: Record review: No Discrimination Management Procedure (Doc. No: LY-RBA-COP004, Rev. 0/1, Issue date: November 10, 2023) stipulates that it is not allowed to take any kinds of discrimination, harassment, inhumane treatment for any employee.</p> <p>Data Point 3: 24 out of 24 payroll records, disciplinary records and promotion records covering the period of Aug. 2023 to Aug. 2024 confirm: a) No evidence of discrimination, harassment, inhumane treatment, or threat of these exists. b) No evidence of discrimination, harassment, inhumane treatment in accessing training. c) No evidence of discrimination, harassment, inhumane treatment, or threat of these exists for worker representation.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A5.2
Question Text	Disciplinary actions are recorded and reviewed by management.
Rating	Conformance
Conclusion	Disciplinary actions are recorded and reviewed by management.
Data Points	<p>Data Point 1: Record review: 2 out of 2 disciplinary records covering the period of Aug. 2023 to Aug. 2024 demonstrate a) Records of all cases of disciplinary action are available b) All records of disciplinary action against workers must be reviewed by management and verifiably communicated to them c) Disciplinary records show disciplinary actions with a signature or confirmation of the worker.</p> <p>Data Point 2: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 3: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A5.3
Question Text	Reasonable accommodation for religious practices is provided.
Rating	Conformance
Conclusion	Reasonable accommodation for religious practices is provided.
Data Points	<p>Data Point 1: Site observation: Adequate religious areas (office, meeting room) are provided.</p> <p>Data Point 2: Record review: No religious accommodation request received from employees in the last 12 months.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A5.4
Question Text	Reasonable accommodation for disability is provided.
Rating	Conformance
Conclusion	Reasonable accommodation for disability is provided. No disability person is onsite.
Data Points	<p>Data Point 1: Site observation: Adequate accommodations (elevator, auto-machine, handrail for staircase, etc.) for disability are provided. No disability person onsite.</p> <p>Data Point 2: Record review: No disability accommodation request received from employees in the last 12 months.</p> <p>Data Point 3: Record review: No disability accommodation decision communication is available because of no religious accommodation request.</p>

	<p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA</p> <p>Supporting evidence reference(s): NA</p>
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A6) FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Question #	VAP-A6.1
Question Text	Workers can form or enroll in a trade union of their own free will.
Rating	Conformance
Conclusion	Workers can form or enroll in a trade union of their own free will. No train union is set.
Data Points	<p>Data Point 1: Site observation: a) No evident presence of violence and explicit threats of any kind b) No evident presence of management's control of worker representation exists c) No evident presence of a prohibition of association with a worker representation.</p> <p>Data Point 2: Record review: The grievance records covering the period of Aug. 2023 to Aug. 2024 demonstrate a) There are no recorded episodes of violence, explicit threats of any kind or any other violations of the right to freedom of association b) Grievance records on Freedom of Association are acted upon if the grievance is valid.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA</p> <p>Supporting evidence reference(s): NA</p>

Question #	VAP-A6.2
Question Text	The legal rights of all workers to bargain collectively, or refrain from doing so, are respected.
Rating	Conformance
Conclusion	Legal rights of all workers to bargain collectively, or refrain from doing so, are respected.
Data Points	<p>Data Point 1: Site observation: No evidence of refusal by management to enter negotiations upon request by the worker representatives.</p> <p>Data Point 2: Record review: 2 out of 2 worker representative body meeting minutes covering the period of Aug. 2023 to Aug. 2024 demonstrate a) No evidence of refusal by management to enter negotiations upon request by the worker representatives b) Site participates in good faith in the collective bargaining process with the official worker representatives.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA</p> <p>Supporting evidence reference(s): NA</p>

Question #	VAP-A6.3
Question Text	Participants respect the legal right of all workers to peacefully assemble.
Rating	Conformance
Conclusion	Participants respect the legal right of all workers to peacefully assemble.
Data Points	<p>Data Point 1: Site observation: No signs of explicit prohibition of the right of peaceful assembly.</p> <p>Data Point 2: Record review: The grievance records covering the period of Aug. 2023 to Aug. 2024 demonstrate a) Respect for the right of workers to individually or collectively; to express, promote, pursue, and defend their concerns or ideas b) Does not interfere with, restrain, or coerce workers in the exercise of their right to individually or collectively; to express, promote, pursue, and defend their concerns or ideas.</p> <p>Data Point 3: Record review: 2 out of 2 worker representative body meeting minutes covering the period of Aug. 2023 to Aug. 2024 demonstrate a) Respect for the right of workers to individually or collectively; to express, promote, pursue, and defend their concerns or ideas b) Does not interfere with, restrain, or coerce workers in the exercise of their right to individually or collectively; to express, promote, pursue, and defend their concerns or ideas.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA</p> <p>Supporting evidence reference(s): NA</p>

A.M.1) RISK ASSESSMENT	
Question #	VAP-A.M.1.1
Question Text	An adequate and effective labor compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Rating	Conformance
Conclusion	An adequate and effective labor compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Data Points	<p>Data Point 1:Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) stipulates that the facility should collect relevant applicable laws, regulations, and customer requirements to ensure their labor aspects compliance with applicable laws, regulations, and customer requirements. And it should have labor compliance process to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.</p> <p>Data Point 2:Record review: All the applicable laws, regulations, and customer requirements on labor are collected and identified in the list and the refresh review records show that the facility reviews them regularly.</p> <p>Data Point 3: Management interview: HR Manager states the facility establishes the law/ regulation compliance evaluation procedure, and conducted the law, regulation, customer requirements compliance evaluation regularly</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A.M.1.2
Question Text	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential labor risks where the facility caused or contributed to adverse labor impacts (including applicable requirements).
Rating	Conformance
Conclusion	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential labor risks where the facility caused or contributed to adverse labor impacts (including applicable requirements).
Data Points	<p>Data Point 1: Labor and Ethic Risk Assessment& Management Procedure (Doc. No: LY-RBA-COP020, Rev. 00/1, Issue date: November 10, 2023) stipulates that risk assessment should a) includes legal and customer requirements b) assesses legal and customer requirements c) identifies how legal and customer requirements are integrated in the current management system d) documents how legal and customer requirements are implemented.</p> <p>Data Point 2: Risk Assessment Sheet (Document No.: Nil, Revision: Nil, date: Dec.5, 2023) shows the identified high risks on labor component which including Used child labor, Force Labor, Overtime Hours, etc, and it establishes the control plan to control and minimize the identified risks. The corrective action in risk assessments is taken and tracked with documented records.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

A.M.2) CONTROL PROCESSES	
Question #	VAP-A.M.2.1
Question Text	Labor responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.
Rating	Conformance
Conclusion	Labor responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of the management systems, and for compliance with laws, regulations and codes.
Data Points	<p>Data Point 1: Organizational chart and description confirms a senior representative is assigned responsibility a) To ensure compliance with laws and regulations b) Authorities of each organizational level are recorded c) For regular and emergency situations.</p> <p>Data Point 2: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 3: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A.M.2.2
Question Text	Adequate and effective labor policies and control processes are established.
Rating	Major Non-Conformance
Conclusion	<p>1.The Employee Manual (Date: May 1, 2023) is not updated in time, it lacks of below content: childcare leave and nursing leave.</p> <p>2.Unreasonable items in the Employee Manual (Date: May 1, 2023), it does not set up lawful& reasonable items per legal requirement:</p> <p>Article 3.4.1 The one who resign within 1 year would be deducted working suits fee, RMB35/ pcs for summer suit and RMB50/ pcs for winter suit, and the factory would take back the working suit at the same time...The one who resign within 1 year would be deducted working shoes fee (RMB20/ pair).</p> <p>3. The working hours management system is not effectively implemented, it does not in line with <Working Hours Policy>.</p>

Data Points	Data Point 1: Site observation: a) Control measures are in place for identified risks b) Records are securely stored with authorized access only c) Time Recording Devices and manual records are present, and all are in working order.
	Data Point 2: Record review: The Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) is not updated in time, it lacks of below content: childcare leave and nursing leave. Unreasonable items in the Employee Manual (Date: May 1, 2023), it does not set up lawful& reasonable items per legal requirement: Article 3.4.1 The one who resign within 1 year would be deducted working suits fee, RMB35/ pcs for summer suit and RMB50/ pcs for winter suit, and the factory would take back the working suit at the same time...The one who resign within 1 year would be deducted working shoes fee (RMB20/ pair).
	Data Point 3: Record review: <Working Hours Policy> (Doc. No: LY-RBA-COP022, Rev. 00/1, Issue date: November 10, 2023) is not effectively implemented since Major finding identified in A3.1 (OT exceed 36 hours/ month).
	Data Point 4: Management interview: HR Manager confirms the audit observations.
	Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): Working Hours Collection Template

Question #	VAP-A.M.2.3
Question Text	An adequate and effective labor training process is established for all managers/workers on all policy/process/job-related aspects and performance targets.
Rating	Conformance
Conclusion	An adequate and effective labor training process is established for all managers/ workers on all policy/ process/ job-related aspects and performance targets.
Data Points	Data Point 1: Record review: The Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) stipulates that the facility provides the recruitment and regular training to all employees, which including: RBA standards, facility policy, job related aspects and performance targets.
	Data Point 2: Training records covering the period of Aug. 2023 to Jul. 2024 show that all levels of employees (managers and workers) are provided the recruitment training and refresh training annually on all policy/ procedures/ process/ job related aspects and performance targets related to labor.
	Data Point 3: Management interview: HR Manager confirms the audit observations.
	Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

A.M.3) COMMUNICATIONS

Question #	VAP-A.M.3.1
Question Text	An adequate and effective ongoing two-way communication process with workers, and internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational labor practices and conditions and to foster continuous improvement.
Rating	Conformance
Conclusion	An adequate and effective ongoing two-way communication process with workers, and internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational labor practices and conditions and to foster continuous improvement.
Data Points	Data Point 1: Site observation: Feedback channels (hotline, email, suggestion box, face to face communication) are clearly communicated and visible.
	Data Point 2: Record review: The Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) stipulates that an adequate and effective ongoing two-way communication process with workers, and internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational labor practices and conditions and to foster continuous improvement.
	Data Point 3: Management interview: HR Manager confirms the audit observations.
	Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

Question #	VAP-A.M.3.2
Question Text	An adequate and effective process is established to anonymously report labor grievances confidentially without fear of reprisal or intimidation.
Rating	Conformance
Conclusion	An adequate and effective process is established to anonymously report labor grievances confidentially without fear of reprisal or intimidation.
Data Points	Data Point 1: Site observation: a) Grievance channels are clearly communicated b) Internal communication of the grievance mechanism is visible and in a language the workers can understand.
	Data Point 2: Record review: Complaint Management Procedure (Doc. No: LY-RBA-COP008, Rev. 0/1, Issue date: November 10,

	<p>2023) defines the confidential grievance without fear of reprisal or intimidation.</p> <p>Data Point 3: Record review: 2 out of 2 grievance cases covering the period of Aug. 2023 to Aug. 2024 and related treatment result show that it is confidentially without reprisal or intimidation.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>
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A.M.4) PERFORMANCE REVIEW AND CONTINUOUS IMPROVEMENT

Question #	VAP-A.M.4.1
Question Text	An adequate and effective labor management performance review and continuous improvement process is established.
Rating	Conformance
Conclusion	An adequate and effective labor management performance review and continuous improvement process is established.
Data Points	<p>Data Point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) a) Is adequate b) Is effective c) Defines the annual review process: c.a) By senior management: c.b) Of the management system c.c) Of the performance d) Mandates additional action plans if objective is off track. Data point 2: Record review: Annual Management assessment (Doc. No.: Nil, Rev. Nil, Date: Jun.28, 2024) shows that it conducts labor management assessment per RBA Management Manual requirement. Data Point 3: Management interview: HR Manager states that it has labor management performance review and continuous improvement process, HR Department is responsible to follow the objective and target and communicate it to all employees. The facility tracks the objective and target monthly, and make appropriate adjustments if they are off track. Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A.M.4.2
Question Text	An adequate and effective labor self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Rating	Conformance
Conclusion	An adequate and effective labor self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Data Points	<p>Data Point 1: Record review: Internal Assessment Management Procedure (Doc. No: LY-RBA-COP036, Rev. 00/1, Issue date: November 10, 2023) a) Is adequate b) Is effective c) Mandates periodically assess conformance with: c.a) Applicable regulatory requirements c.b) RBA Code requirements c.c) Own policies, standards and management system c.d) Other requirements to which the facility subscribes d) States audit findings are reviewed by senior management.</p> <p>Data Point 2: Record review: Internal Audit Report (Document No.: Nil, Rev. Nil, date: Jun.3, 2024) indicates non-compliances such as overtime working hours are identified.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-A.M.4.3
Question Text	An adequate and effective labor corrective action process is established to rectify and close non-conformances.
Rating	Conformance
Conclusion	An adequate and effective labor corrective action process is established to rectify and close non-conformances.
Data Points	<p>Data Point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) a) Is adequate b) Is effective c) Defines the corrective action plans and tracking tables d) Mandates additional actions are taken when a corrective action is off-track e) Requires a demonstrated link between the CAP and the performance management objectives and targets. f) States all actions must be verifiably closed g) Requires closure of action items is confirmed by a management representative after verification by the appropriate person h) Mandates if any non-conformance is confirmed, a recorded corrective action is implemented.</p> <p>Data Point 2: Record review: Corrective action records for non-compliances in daily operation, show that corrective action is implemented on labor, and the corrective action report includes root cause analysis, owner, target date and tracking on the action status.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

B) Health & Safety

B1) OCCUPATIONAL HEALTH AND SAFETY

Question #	VAP-B1.1
Question Text	All required permits, licenses, and test reports for Occupational Health and Safety are in place and communicated timely to the government (if required).
Rating	Major Non-Conformance
Conclusion	The factory does not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building.
Data Points	<p>Data point 1: Site observation: Special equipments such as elevators, pressure vessels, forklifts etc. are used in the facility.</p> <p>Data point 2: Record review: RBA manual states the EHS department takes responsibility to ensure all legally required permits, licenses and test reports for occupational safety are updated in time.</p> <p>Data point 3: Record review: The facility provides accepted Special Equipment Use Registration Certificates for review.</p> <p>Data point 4: Record review: The facility provides accepted Special Equipment Inspection Reports for review.</p> <p>Data point 5: Record review: The facility provides accepted Lightning-proof Facilities Test Report for review.</p> <p>Data point 6: Record review: The facility provides accepted Drinking Water Test Report for review.</p> <p>Data point 7: Record review: The factory did not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building.</p> <p>Data point 8: Management review: EHS Manager states EHS department is responsible for it and ensure certificates, permits and licenses are valid and up to dates, etc. However, the factory does not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building. The factory claimed it would apply for building acceptance registrations/reports after all buildings in the compound are built up.</p> <p>Legal references: Construction Law of the People's Republic of China (2019 Amendment), Article 61 ... A construction project may only be handed over for use upon passing the acceptance checks; no construction project shall be handed over for use without going through the acceptance checks or passing the acceptance checks.</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-B1.2
Question Text	Occupational health & safety hazards are identified, assessed, and mitigated using the Hierarchy of Controls, which includes eliminating, substituting, and controlling through proper design, process and administrative controls, and appropriate Personal Protective Equipment (PPE) which is consistently and correctly used.
Rating	Major Non-Conformance
Conclusion	2 out of 2 board cutting workers does not wear ear-plug during operation. 4 out of 4 workers in solder mask workshop wear hygienic masks, instead of active carbon masks. One worker worked in silk print workshop does not wear active carbon mask. Based on interview, the factory provided ear-plugs and active carbon masks. But the workers do not wear PPEs because of PPEs are uncomfortable.
Data Points	<p>Data point 1: Site observation: Facility building is structurally safe and sound. Aisles, stairways, and work areas are free of tripping hazards. All electricity devices are free of obstruction. Other warning signs and labels regarding PPE using, occupational hazards, machine hazards and chemical hazards are also available. Proper safety guards are equipped for hazardous and moving parts on operation machines. Pedestrian walkways are clearly delineated and physically separated with vehicles. 2 out of 2 board cutting worker does not wear ear-plug during operation. 4 out of 4 workers in solder mask workshop wear hygienic masks, instead of active carbon masks. One worker worked in silk print workshop do not wear active carbon mask.</p> <p>Data point 2: Record review: EHS operation control procedure states all hazardous working of hot work, energized electrical work, hoisting work, excavation work, height work and restricted space work must have work permits and job hazard analysis. The work permit should be displayed at the workplace. The operator should read and follow up the requirements of work permit. The onsite management should return the work permit after the work is completed. Routine inspections are conducted for electricity facilities and industrial powered vehicles by competent person. Relevant pre-job and on the job trainings as well as operation trainings are provided to all affected workers. The trainings also include the instruction of encouraging workers to report safety concerns. The reporter will be praised by facility senior management. Internal audits are conducted periodically to ensure the implementation and effectiveness.</p> <p>Data point 3: Management interview: EHS Manager states the facility has identify the risk including harm by machines, electrical shock, press vessel, forklift, limited space, hot working, working with electronic and fall from high. Related control measures have been published accordingly. Workers have been trained on general safety hazards pre-job and on the job trainings. Workers are encouraged to report safety concerns and reporting channels (including hotline, worker representative and directly talking with supervisors) are posted in production areas. He confirms the board cutting workers does not wear ear-plug during operation. the workers in solder mask workshop wear hygienic masks, instead of active carbon masks. the worker worked in silk print workshop does not wear active carbon mask. The factory provided ear-plugs and active carbon masks.</p> <p>Data point 4: Worker interview: 22 out of 22 workers interviewed workers state they receive per-job training of safety hazards in the facility. They understand safety rules of lockout / tagout, electrical safety, fire and works at heights, including before any work begins on machines that have been tagged out; the lock out responsible must verify that the machine or equipment has been properly isolated state. They are encouraged to report safety concerns and reporting channels (including hotline, worker representative and directly talking with supervisors) are posted in production areas.</p> <p>Data point 5: Worker interview: one board cutting worker, one workers in solder mask workshop and one worker worked in silk print workshop confirm the factory provides proper PPEs. But they do not wear PPEs because of PPEs are uncomfortable sometimes.</p> <p>Legal references: Production Safety Law of the People's Republic of China (2021 Amendment), Article 45 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules.</p> <p>Supporting evidence reference(s): Photo B1.2-1, B1.2-2</p>

Question #	VAP-B1.3
Question Text	Gender-responsive measures are taken to ensure pregnant women and nursing mothers are not in working conditions, which could be hazardous to them or their child, and provide reasonable accommodations for nursing mothers.
Rating	Conformance
Conclusion	Gender-responsive measures are taken to ensure pregnant women and nursing mothers are not in working conditions, which could be hazardous to them or their child, and provide reasonable accommodations for nursing mothers.

	<p>Data point 1: Site observation: a) No pregnant worker or nursing mother is in the facility. b) Reasonable accommodation for nursing mothers is in place.</p> <p>Data point 2: Record review: Female Worker Protection and Management Procedure states the facility's commitment to minimize the Health & Safety impact in pregnant woman and nursing mothers. The procedure is established to indicate the risk assessment and management process on potential hazards for new and expectant mothers.</p> <p>Data point 3: Management interview: EHS Manager states the facility has Female Worker Protection and Management Procedure on minimize the Health & Safety impact in pregnant woman and nursing mothers and reasonable accommodation for nursing mothers is in place.</p> <p>Data Point 4: Worker interview: 22 out of 22 workers state reasonable accommodation for nursing mothers is in place.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

B2) EMERGENCY PREPAREDNESS

Question #	VAP-B2.1
Question Text	Adequate and effective fire detection, alarm and suppression systems are in place
Rating	Conformance
Conclusion	Adequate and effective fire detection, alarm and suppression systems are in place.
	<p>Data point 1: Site observation: a) Automatic heat and smoke detection as required by law/insurance company is in place b) Detector devices and system are in function c) All buildings have a manual or automatic fire alarm and notification system d) fire alarm control system is free of trouble e) fire alarm manual call-points or pull-stations are provided at or along egress routes to exits f) Portable fire extinguishers are installed g) fire extinguisher inspection tags are present and up to date h) automatic fire sprinklers as required by law insurance company is installed appropriately i) fire hose inspection tags are present and up to date j) fire water tank and water pressure are normal.</p> <p>Data point 2: Record review: Emergency Respond Management Procedure states the process and schedule for a) automatic fire sprinklers (if required by law or insurance company) b) portable fire extinguishers c) heat and smoke detection d) alarm and notification system to be on a regular basis, as required by insurance company or common practice: e) inspected f) tested g) maintained.</p> <p>Data point 3: Management interview: EHS Manager states which firefighting systems are in place, explains which alarm and notification system is in place, and confirms how often these systems are a) inspected b) tested c) maintained.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state where are the nearest a) fire extinguishers b) hose station c) fire alarm call-points.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-B2.2
Question Text	Effective emergency preparedness and response programs (plans/process) are established
Rating	Conformance
Conclusion	Effective emergency preparedness and response programs (plans/process) are established.
	<p>Data point 1: Site observation: Emergency response plan which includes clear and obvious evacuation plan, etc. are displayed in all workshops.</p> <p>Data point 2: Record review: Emergency Respond Management Procedure states the facility has established preparedness, reporting, response programs to address all likely types of emergencies such as fire, accident injury, food poisoning, chemical leakage, and natural disasters like flood, storm, earthquake, seaquake, strike, etc., and business resumption procedure after the disaster or accident, the plan should be reviewed and updated every year.</p> <p>Data point 3: Management interview: EHS Manager states the facility has identified all emergency situations affected to the business.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they are trained to run to the muster point as quickly as possible when any incident occurs.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-B2.3
Question Text	Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained
Rating	Major Non-Conformance
Conclusion	1) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. 2) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.
	<p>Data point 1: Site observation: a) Clear and unobstructed egress. b) Exit signs are provided to mark exits on every floor. c) Exit signs are illuminated and lighted in the event of a power failure. d) Additional exit and directional signs are provided at main passageways, long corridors and other locations where the way to the nearest exit is unclear. e) Emergency lighting provided and installed to illuminate means of egress in the event of a power failure. f) Muster points have been established in safe locations to enable employee accountability during an emergency. g) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. h) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.</p> <p>Data point 2: Record review: Fire inspection records indicate that EHS department inspects fire facility including emergency lights, emergency exits and signs, firefighting facilities once per month and summarizes inspection.</p>
Data Points	

	<p>Data point 3: Record review: EHS Manager states they inspect fire facility including emergency lights, emergency exits and signs, firefighting facilities once per month and summarizes inspection. He confirms a) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. b) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they know the fire exit access, exits and muster points, and they have been trained in fire drills and emergency plan.</p> <p>Data point 5: Worker interview: One worker in FQC workshop confirms one safe exit door is slide door with sensor switch. One worker in solder mask workshop confirms the safe exit doors are not installed safe exit sign.</p> <p>Legal references: Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment), Article 6.4.11 The evacuation door in the building shall meet the following requirements: 1. The evacuation door in the civil building and factory building shall be side-hung door opened to the evacuation direction, and shall not be sliding door, roller shutter, overhung door, revolving door or folding door. General code for fire protection of buildings and constructions(GB 55037-2022) 10.1.8 Except for silos, bulk grain warehouses, and places with slow fire development, the following buildings should be equipped with illuminated evacuation signs. The evacuation signs and their spacing and illumination should ensure clear evacuation route indications, correct and clear direction indications, and continuous visual continuity: 1. Class A, B, and C factories, as well as high-rise Class D and E factories; Supporting evidence reference(s): Photo B2.3-1, B2.3-2</p>
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Question #	VAP-B2.4
Question Text	Adequate and effective fire and other identified emergency evacuation drills are conducted with all workers and people on site
Rating	Conformance
Conclusion	Adequate and effective fire and other identified emergency evacuation drills are conducted with all workers and people on site.
Data Points	<p>Data point 1: Record review: Emergency Respond Management Procedure states a) Fire b) Other emergencies c) Emergency drills must be executed c.a) annually or local law frequency d) ERP drill plan must include at minimum d.a) All workers d.b) Every area d.c) All work shifts d.d) While it is dark outside) d.e) Appropriate frequency for other than fire emergency situations based on risk assessment.</p> <p>Data point 2: Management interview: EHS Manager a) states when the previous drill was held b) details all corrective actions from the drill have been completed or tracked.</p> <p>Data point 3: Worker interview: 22 out of 22 workers a) explain what happens during an emergency drill (stop work, evacuate, muster points) b) confirm the last drill they participated in workplace.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

B3) OCCUPATIONAL INJURY AND ILLNESS

Question #	VAP-B3.1
Question Text	Work-related accidents, near-misses, and illnesses are reported, tracked, accurate, investigated, and analyzed, and workers are not in situations that can cause them imminent harm.
Rating	Conformance
Conclusion	Work-related accidents, near-misses, and illnesses are reported, tracked, accurate, investigated, and analyzed, and workers are not in situations that can cause them imminent harm.
Data Points	<p>Data point 1: Site observation: a) Workers are not in situations that can cause imminent harm b) Areas that can cause imminent harm to workers are free of workers and b.a) are signed, and b.b) access is restricted.</p> <p>Data point 2: Record review: OHS incident reports include: a) All reportable accidents. b) All non-reportable accidents. c) All incidents. d) All near misses. e) Recordings are accurate. f) Occupational illness data. g) Surveillance data. h) Recordings are current.</p> <p>Data point 3: Record review: OHS incident investigation reports demonstrate: a) All accidents are investigated. b) All incidents are investigated. c) All accidents are analyzed to minimize the potential for future occurrence. d) All incidents are analyzed to minimize the potential for future occurrence.</p> <p>Data point 4: Record review: OHS trend analysis reports demonstrate: a) Trend analysis of the occupational injuries is performed at least annually. b) Trend analysis of the occupational illnesses data is performed at least annually.</p> <p>Data point 5: Record review: Imminent harm reports: a) are available b) complete, and c) accurate d) for all instances where workers removed themselves from imminent harm e) Containment plans for instance is available and appropriate f) Assessment reports of containment of the imminent harm situations providing a "no imminent harm" conclusion before workers return to the area.</p> <p>Data point 6: Management interview: EHS Manager states no accident, near-miss, or illness. They provide pre-job, on-the-job and off-the-job occupational health examination for workers with occupational hazards.</p> <p>Data point 7: Worker interview: 22 out of 22 workers state no accident, near-miss, or illness. 2 out of 2 workers contacted with occupational hazard state the facility arranges them to conduct occupational health examination for free.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-B3.2
Question Text	Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available
Rating	Conformance
Conclusion	Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available.

	<p>Data point 1: Site observation: The first aid kits have adequate supplies and are inspected on a monthly basis in the production areas. The facility installs eyewash equipment with enough water pressure in the chemicals used area and chemical warehouse.</p> <p>Data point 2: Record review: Work-related Injury Management Regulation states the inspection implemented on the monthly basis, etc.</p> <p>Data point 3: Management interview: EHS Manager states the facility provides adequate supplies for the first aid kits and conducts monthly inspection. The facility installs eyewash equipment with enough water pressure in the chemicals used area and chemical warehouse.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state the first aid kits have adequate supplies, and the facility conducts inspection for the first aid monthly. The facility installs eyewash equipment with enough water pressure in the chemicals used area and chemical warehouse.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

B4) INDUSTRIAL HYGIENE

Question #	VAP-B4.1
Question Text	Workers' exposures to chemical, biological, and physical hazards are identified, evaluated, and adequately controlled in accordance with the hierarchy of controls, which is maintained through ongoing, systematic monitoring of worker's health.
Rating	Conformance
Conclusion	Workers' exposures to chemical, biological, and physical hazards are identified, evaluated, and adequately controlled in accordance with the hierarchy of controls, which is maintained through ongoing, systematic monitoring of worker's health.
	<p>Data point 1: Site observation: Controls to reduce or eliminate worker exposure to chemical, biological and physical agents are in place.</p> <p>Data point 2: Record review: EHS operation control procedure states an adequate risk assessment process with associated industrial hygiene sampling and testing to identify and assess the potential hazards of chemical, biological, or physical agents.</p> <p>Data point 3: Record review: H&S Risk Assessment Reports are consistent with the procedure.</p> <p>Data point 4: Management interview: EHS Manager states a) Reduction of Industrial hygiene risk assessment program is implemented b) The facility has noise, hazardous chemical industrial hygiene risk c) Ventilation devices and proper PPE is provided.</p> <p>Data point 5: Worker interview: 22 out of 22 workers state controls management has implement on their job/position/area to minimize the risk of chemical, biological and physical agents included ventilation devices and PPE.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference (s): N/A</p>

B5) PHYSICALLY DEMANDING WORK

Question #	VAP-B5.1
Question Text	Worker exposure to the hazards of physically demanding work is controlled effectively
Rating	Conformance
Conclusion	Worker exposure to the hazards of physically demanding work is controlled effectively.
	<p>Data point 1: Site observation: The facility has identified the high frequency physically demanding work. Automatic machines are used in workshop.</p> <p>Data point 2: Record review: Human Factor Engineering Control and Evaluation Procedure states the facility evacuates the highly repetitive tasks and static works by control measures of the physical demanding works used. The facility identifies physically demanding work risk for working with a long time standing as well. The training records with training materials show that the training on human-factors engineering is provided for all workers once per year.</p> <p>Data point 3: Record review: Ergonomic risk identification and evaluation forms show the ergonomics issues including heavy lifting and highly repetitive tasks has been identified and evaluated. The physically demanding work risk analysis for working with a long-time standing is identified. Facility will adjust their ergonomic control strategies according to the analysis result to ensure the effectiveness.</p> <p>Data point 4: Management Interview: EHS Manager states ergonomic risk identification and evaluation is performed, and it will be conducted every year. And the facility provides training on human-factors engineering to all workers once per year.</p> <p>Data point 5: Worker interviews: 22 out of 22 workers state heavy physically demanding work is changed step by step by automatic machines in the facility. They receive training for physically demanding work control measures.</p>
Data Points	<p>Legal references: N/A</p> <p>Supporting evidence reference (s): N/A</p>

B6) MACHINE SAFEGUARDING

Question #	VAP-B6.1
Question Text	An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely.
Rating	Conformance
Conclusion	An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely.
Data Points	<p>Data point 1: Site observation: Machines are installed with safety devices and guards including emergency stop buttons, interlock systems, and physical guards to ensure workers operate machine safety. Hazards signs safe work instruction are displayed on machines and no bypasses of safety by workers noted. The workers are working at safety stations.</p> <p>Data point 2: Record review: EHS operation control procedure states the equipment department and EHS department conduct risk assessment to identify machines safeguarding need and takes responsibility to test and inspect the availability of the safeguarding.</p>

	<p>Data point 3: Management interview: EHS Manager states equipment department and safety department would assess the necessity of safety guards and emergency stops for all machines.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they all know how to proper use the machine safeguards and emergency stop switches, and they have attended machine safe operation training during the pre-job health & safety training.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference (s): N/A</p>
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B7) FOOD, SANITATION AND HOUSING

Question #	VAP-B7.1
Question Text	Worker housing is clean, safe and well-maintained and meet international housing standards
Rating	Conformance
Conclusion	Worker housing is clean, safe and well-maintained and meet international housing standards.
Data Points	<p>Data point 1: Onsite observation: Dormitory and sanitary facilities (common areas, hallways, rest rooms and so on) are clean and properly maintained. Emergency lights and fire exit signs are installed. Hot water for bathing or showering is available for 24 hours. Windows were available in each room. Adequate lighting and sufficient electricity sockets are provided. There is no cooking facility in the dormitory. Adequate domestic waste disposal facilities are in place. Sufficient space is available for each worker and individual lockers for private secured storage are available. All facilities are separated by gender and adequate in number. Workers drink heated tap water is available in dormitory area.</p> <p>Data point 2: Management interview: EHS Manager states that dormitory and sanitary facilities are clean and properly maintained. Emergency lights and fire exit signs are installed. Hot water for bathing or showering is available for 24 hours. All facilities are separated by gender and adequate in number. Workers drink heated tap water is available in dormitory area.</p> <p>Data point 3: Worker interview: 22 out of 22 sampled workers state that they live in dormitory and the dormitory facilities are adequate, clean and safe.</p> <p>Legal references: NA.</p> <p>Supporting evidence reference(s): NA</p>

Question #	VAP-B7.2
Question Text	Bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed
Rating	Conformance
Conclusion	Bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed.
Data Points	<p>Data point 1: Site observation: The canteen and kitchen is clean and well maintained. Food service workers wear masks, hairnets and gloves, as necessary to prevent food contamination. Canteen is provided with adequate hand washing facilities. Bathrooms, employee spaces are safe, clean, well maintained, and well managed</p> <p>Data point 2: Record review: Bathrooms, employee spaces, cafeterias, food areas cleaning records show the canteen is cleaned every meal.</p> <p>Data point 3: Management interview: EHS Manager states bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

B.M.1) RISK ASSESSMENT

Question #	VAP-B.M.1.1
Question Text	An adequate and effective Occupational Health and Safety compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Rating	Conformance
Conclusion	An adequate and effective Occupational Health and Safety compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Data Points	<p>Data point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) states the facility needs to obtain, identify, assess, integrate, implement and update legal requirements and other requirements to ensure the operation activity conform to Health & Safety management system regularly. New/changed operations requires to be reviewed for applicable regulatory and customer requirements before start-up.</p> <p>Data point 2: Record review: All the legal and customers' special requirements on Health & Safety are also collected and identified in the list and the refresh review records show that the facility reviews them regularly.</p> <p>Data point 3: Management interview: EHS Manager states the facility establishes the law/regulation compliance evaluation procedure, they work together with safety team to collect and review the law & regulation & review the customer requirements regularly.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-B.M.1.2
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Question Text	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential occupational health and safety risks where the facility caused or contributed to adverse occupational health and safety impacts (including applicable requirements).
Rating	Conformance
Conclusion	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential occupational health and safety risks where the facility caused or contributed to adverse occupational health and safety impacts (including applicable requirements).
Data Points	<p>Data point 1: Record review: EHS risk Identification and Assessment Management Procedure (Doc. No: LY-RBA-COP026, Rev. 00/1, Issue date: November 10, 2023) states risk management process to identify, assess and minimize, monitor and control risks on Health & Safety, and the risk assessment is conducted at least once per year as per the procedure.</p> <p>Data point 2: Record review: Risk assessment reports show that the facility identifies the high risks on Health & Safety and establishes the procedural controls and action plans to control and minimize the identified risks for all operation process and working areas. The corrective action noted during risk assessments are taken and tracked with documented records.</p> <p>Data point 3: Record review: Training materials and records show that workers and managers are trained with responsibilities for implementing the controls and actions.</p> <p>Data point 4: Management interview: EHS Manager states the identified high risks on Health & Safety and are known by risk assessment and they establish a long-time control plan to reduce the risks. The corrective actions are taken and tracked with documented records.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

B.M.2) CONTROL PROCESSES

Question #	VAP-B.M.2.1
Question Text	Occupational health and safety responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.
Rating	Conformance
Conclusion	Occupational health and safety responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.
Data Points	<p>Data point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) states the responsibilities and authorities for the top management of managers and supervisor, shift leader and workers.</p> <p>Data point 2: Record review: Training plan and records are available for review including the RBA responsibilities and authorities training for different level/rank of employees in normal and emergency situations.</p> <p>Data point 3: Management interview: EHS Manager states responsibilities and authorities for different level/rank of employees, including manager, supervisor, shift leader and workers within the organization. The responsibilities and reporting lines are regulated in the management system and manuals. The management system can be overridden under specific emergency situations and life-threatening conditions.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they know the direct reporting channel and their responsibilities and authorities for their own positions. The senior management who is responsible for execution and management for each component.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-B.M.2.2
Question Text	Adequate and effective occupational health and safety policies and control processes are established.
Rating	Conformance
Conclusion	Adequate and effective occupational health and safety policies and control processes are established.
Data Points	<p>Data point 1: Record review: EHS operation control procedure (Doc. No: LYKJ-CX-15, Rev. B/0, Issue date: December 1, 2023) states the health and safety policies and control processes. The policies and control processes are effectively implemented.</p> <p>Data point 2: Management interview: EHS Manager confirms the Health & Safety policies and control processes are established and effectively implemented.</p> <p>Data point 3: Worker interview: 22 out of 22 workers confirm the Health & Safety policies and control processes are established.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-B.M.2.3
Question Text	An adequate and effective occupational health and safety training process is established for all managers/workers on all policy/process/job-related aspects and performance targets.
Rating	Conformance
Conclusion	An adequate and effective occupational health and safety training process is established for all managers/workers on all policy/process/job-related aspects and performance targets.
Data Points	<p>Data point 1: Record review: Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) states the training to employees and the communication with workers. Training plans are made each year per training needs analysis. Annual review and interviews/tests after trainings are conducted to verify the training efficiency.</p> <p>Data point 2: Record review: Training plan, training records and training materials show that the facility conducts RBA training for all employees before taking the job and regularly, training contents including Health & Safety.</p> <p>Data point 3: Management interview: EHS Manager states the facility communicates RBA performance objectives and targets with workers through orientation training and annual refreshing training, and with suppliers through emails and meetings. Training</p>

	<p>needs analysis is made per the review results of last year's trainings and updates on facility conditions and legal/customer requirements. The facility conducts RBA training for all employees before taking the job and regularly, training contents include Health & Safety.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state the facility conducts RBA training for all of them before taking the job and regularly, training contents include Health & Safety. The facility will verify their understanding by interviews/tests after trainings.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>
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B.M.3) COMMUNICATIONS

Question #	VAP-B.M.3.1
Question Text	An adequate and effective ongoing two-way communication process with workers, internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational occupational health and safety practices and conditions and to foster continuous improvement.
Rating	Major Non-Conformance
Conclusion	3 out of 3 hazardous chemical sub-containers do not mark with safety label. The acetone in ink mixing room does not mark with safety label.
Data Points	<p>Data point 1: Site observation: a) 3 out of 3 hazardous chemical sub-containers do not mark with safety label. b) The acetone in ink mixing room does not mark with safety label.</p> <p>Data point 2: Record review: Internal and External Communication Control Procedure (Doc. No: LYKJ-CX-16, Rev. B/0, Issue date: December 1, 2023) defines the communication, feedback & participation, the training to workers/employees and the communication with suppliers and customers on occupational health and safety, performance objectives and targets, which are updated annually.</p> <p>Data point 3: Record review: Occupational health and safety training and communication records show that the facility communicates their occupational health and safety policy, objectives and status to their suppliers; mails show that the facility communicates their occupational health and safety policy, objectives and yearly occupational health and safety performance to their key customers by net sharing; internal training shows that the facility communicates their occupational health and safety policy, objectives and status to their own employees.</p> <p>Data point 4: Management interview: EHS Manager states they communicate and train all employees and suppliers on occupational health and safety and submit commitment letters and provide trainings on occupational health and safety to all customers. The communications between factory and suppliers and customers are completed by emails and meetings. At least annual updates are required. He confirms 3 out of 3 hazardous chemical sub-containers do not mark with safety label and the acetone in ink mixing room does not mark with safety label.</p> <p>Data point 5: Worker interview: 22 out of 22 workers state the requirements of occupational health and safety and know where they can find the information about occupational health and safety.</p> <p>Data point 5: Worker interview: 2 out of 2 workers who use chemicals confirm some chemicals do not mark with safety label.</p> <p>Legal references: Regulations on Safety Use of Chemicals in Workplaces (1996), Article 12, Chemicals used shall have the labels, and the hazardous chemicals should be attached with safety labels. Also, the safety and technical instructions of the chemicals shall be available for operators engaged in the use of the chemical.</p> <p>Supporting evidence reference(s): Photo B.M.3.1-1, B.M.3.1-2</p>

Question #	VAP-B.M.3.2
Question Text	An adequate and effective process is established to anonymously report occupational health and safety grievances confidentially without fear of reprisal or intimidation.
Rating	Conformance
Conclusion	An adequate and effective process is established to anonymously report occupational health and safety grievances confidentially without fear of reprisal or intimidation.
Data Points	<p>Data point 1: Record review: Complaint Management Procedure (Doc. No: LY-RBA-COP008, Rev. 0/1, Issue date: November 10, 2023) defines the confidential grievance without fear of reprisal or intimidation.</p> <p>Data point 2: Record review: No grievance case in the past 12 months.</p> <p>Data point 3: Management interview: EHS Manager states an adequate and effective confidential grievance without fear of reprisal or intimidation is established. No grievance case in the past 12 months.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they are communicated with the grievance and complaint channels (suggestion box, email, APP, telephone, face to face meeting, etc.) by recruitment training and annual training, and they state the grievances or complaints can be confidentially reported and without fear of reprisal or intimidation.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

B.M.4) PERFORMANCE REVIEW AND CONTINUOUS IMPROVEMENT

Question #	VAP-B.M.4.1
Question Text	An adequate and effective occupational health and safety management performance review and continuous improvement process is established.
Rating	Conformance
Conclusion	An adequate and effective occupational health and safety management performance review and continuous improvement process is established.
Data Points	<p>Data point 1: Record review: Management review control procedure (Doc. No: LYKJ-CX-03, Rev. B/0, Issue date: December 1, 2023) states the top management is responsible for periodically management review of the Health & Safety management system, to ensure the suitability, adequacy and effectiveness of the systems. An adequate and effective management review and continuous improvement process for Health & Safety is established.</p> <p>Data point 2: Management interview: EHS Manager states the management review is conducted at least once per year which included the RBA standards, local law and customer requirements.</p>

	Data point 3: Worker interview: 22 out of 22 workers state they are aware of performance objectives, targets and implementation plans. Legal references: N/A Supporting evidence reference(s): N/A
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Question #	VAP-B.M.4.2
Question Text	An adequate and effective occupational health and safety self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Rating	Conformance
Conclusion	An adequate and effective occupational health and safety self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Data Points	Data point 1: Record review: Internal Audit Control Procedure (Doc. No: LYKJ-CX-04, Rev. B/0, Issue date: December 1, 2023) states the frequency for internal audit on Health & Safety components is once per year based on all applicable requirement (including local law, RBA Code, customer requirement, facility own requirement), and it shall include all areas of the facility, all operation processes, review of documents and records and worker interviews covering Health & Safety. Data point 2: Record review: Audit Checklist shows that the facility has conducted self-assessment of Health & Safety. The internal audit plan, agenda, checklist, meeting minutes, corrective actions for identified findings are provided for review, covering Health & Safety. Data point 3: Management interview: EHS Manager states formal self-audit program on Health & Safety is conducted at least once per year. Legal references: N/A Supporting evidence reference(s): N/A

Question #	VAP-B.M.4.3
Question Text	An adequate and effective occupational health and safety corrective action process is established to rectify and close non-conformances.
Rating	Conformance
Conclusion	An adequate and effective occupational health and safety corrective action process is established to rectify and close non-conformances.
Data Points	Data point 1: Record review: Corrective and Preventive Actions Control Procedure (Doc. No: LYKJ-CX-05, Rev. B/0, Issue date: December 1, 2023) states corrective and preventive action will be taken for any non-conformance on Health & Safety identified in internal and external audit. The corrective and preventive actions shall be track and for off track incidents, facility shall take additional actions to get back on schedule. The records are required to keep for at least 3 years. Data point 2: Record review: Corrective action records in last internal audit conducted shows that corrective actions are implemented, the corrective action report includes root cause analysis, specific actions, owner, target date, evidence of action taken and tracking on the action status. The implementation of corrective actions is verified by the system improvement team. The corrective actions taken are linked with facility's continuous improvement objectives. Data point 3: Management interview: EHS Manager states corrective and preventive action will be taken for any non-conformance on Health & Safety identified in internal and external audit. They can state the process of corrective action plan and corrective action is in process now. Legal references: N/A Supporting evidence reference(s): N/A

C) Environmental

C1) ENVIRONMENTAL PERMITS AND REPORTING

Question #	VAP-C1.1
Question Text	All required permits, licenses and test reports for environment are in place and communicated timely to the government (if required).
Rating	Conformance
Conclusion	All required permits, licenses, and test reports for the environment are in place and communicated timely to the government.
Data Points	Data point 1: Site observation: a) Permits, report and test results for environment are posted when required b) Required postings are current and located in public view. Data point 2: Document review: RBA manual states the EHS department takes responsibility for ensure legally required permits, licenses, approvals and registrations for environmental are obtained and renewed timely. And the EHS department also conducts internal assessment before the processes reconstructed, expanded or newly added. Data point 3: Document review: The facility has obtained Environmental Impact Assessment Report, Environmental Impact Assessment Approval and Self-acceptance report of Environmental Facilities, etc. from local environmental protection bureau, or local qualified organization. Data point 4: Management interview: EHS Manager states the Environmental Impact Assessment Report, Environmental Impact Assessment Approval and Acceptance Approval of Environmental Facilities are required and Certificate/Permit management Procedure is in place to ensure permits, approvals, registrations and licenses are renewed before current permits expire. Legal references: N/A Supporting evidence reference(s): N/A

C2) HAZARDOUS SUBSTANCES

Question #	VAP-C2.1
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Question Text	Hazardous waste is responsibly disposed of using government-approved and/or licensed vendors
Rating	Conformance
Conclusion	Hazardous waste is responsibly disposed of using government-approved and/or licensed vendors.
Data Points	<p>Data point 1: Record review: Non-government transport and disposal vendors assessments demonstrate: a) Assessment reports for each non-government transport and disposal vendor. b) For each assessment of a non-government transport and disposal vendor possible areas for improvement are established.</p> <p>Data point 2: Record review: Hazardous waste inventory records are: a) Accurate. b) Maintained.</p> <p>Data point 3: Record review: Hazardous waste inspection records are: a) Accurate. b) Maintained. c) In place for each hazardous waste. d) In place for each point of storage of hazardous waste.</p> <p>Data point 4: Record review: Copies of hazardous waste shipping papers are: a) Accurate. b) Maintained.</p> <p>Data point 5: Record review: Non-government transport and disposal vendors certificates or licenses are: a) Current. b) Approved by the local regulatory authorities. c) Certificates by the local regulatory authorities. d) Maintained for all non-government transport and disposal vendors.</p> <p>Data point 6: Management interview: EHS Manager confirms the audit observations</p> <p>Data point 7: Worker interview: 22 out of 22 workers (including 1 worker who handle hazardous waste) confirm the audit observations</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

C3) SOLID WASTE

Question #	VAP-C3.1
Question Text	Solid waste is managed and disposed of responsibly.
Rating	Conformance
Conclusion	Solid waste is managed and responsibly disposed of.
Data Points	<p>Data point 1: Site observation: a) Engineering controls are adequate and effective. b) Waste is adequately and effectively categorized. c) Waste is adequately and effectively handled. d) Waste is adequately and effectively stored. e) Waste is adequately and effectively moved within a single facility. f) Moved between multiple facilities. g) Waste access is controlled. h) Waste is adequately and effectively segregated. i) Waste is adequately and effectively ventilated. j) Waste has adequate and effective fire protection. k) Potential employee exposure methods are adequate and effective.</p> <p>Data point 2: Record review: Waste inventory records are: a) Accurate. b) Maintained.</p> <p>Data point 3: Record review: Waste inspection records are: a) Accurate. b) Maintained. c) In place for each waste. d) In place for each point of storage of waste. e) Demonstrating process and administrative controls are effective.</p> <p>Data point 4: Record review: Copies of waste shipping papers are a) Accurate. b) Maintained.</p> <p>Data point 5: Record review: Non-government transport and disposal vendors certificates or licenses are: a) Current. b) Approved by the local regulatory authorities. c) Certificates by the local regulatory authorities. d) Maintained for all non-government transport and disposal vendors.</p> <p>Data point 6: Management interview: EHS Manager confirms the audit observations.</p> <p>Data point 7: Worker interview: 22 out of 22 workers (including 1 worker who handle waste) confirm the audit observations.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

C4) AIR EMISSIONS

Question #	VAP-C4.1
Question Text	Air emissions and the performance of air emission control systems are routinely monitored.
Rating	Conformance
Conclusion	Air emissions and the performance of air emission control systems are routinely monitored.
Data Points	<p>Data point 1: Site observation: a) Engineering controls are adequate and effective. b) Air emission treatment equipment are well maintained. c) Air emission treatment equipment are appropriate. d) Air emission treatment equipment are identified. f) Air emissions are treated prior to discharge in accordance with permit requirements. g) no ozone depleting substance is used.</p> <p>Data point 2: Record review: The air emissions were test by qualified 3rd party company, the accepted testing report has been provided.</p> <p>Data Point 3: Management interview: EHS Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 22 out of 22 workers confirm the audit observations.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-C4.2
Question Text	Environmental noise levels are within regulatory limits.
Rating	Conformance
Conclusion	Environmental noise levels are within regulatory limits.
Data Points	Data point 1: Site observation: a) Engineering controls are adequate and effective. b) No excessive boundary noise. c) Boundary noise control devices are well maintained. d) Boundary noise control devices are appropriate. e) Boundary noise control devices

	<p>are identified.</p> <p>Data point 2: Record review: Maintenance records are: a) Accurate. b) Maintained. c) Boundary noise control devices are in good working order.</p> <p>Data point 3: Record review: Environmental noise test report are: a) Accurate. b) Maintained. c) Showing boundary noise control device efficiency is as required or better. d) Showing process and administrative controls are effective.</p> <p>Data point 4: Record review: Boundary noise control device inspection records are: a) Accurate. b) Maintained. c) Showing boundary noise control device efficiency is as required or better. d) Showing process and administrative controls are effective.</p> <p>Data point 5: Management interview: EHS Manager confirms the audit observations.</p> <p>Data point 6: Worker interview: 22 out of 22 workers confirm the audit observations.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>
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C5) WATER MANAGEMENT

Question #	VAP-C5.1
Question Text	Adequate and effective process are in place to record, characterize, and monitor water sources, water discharge and control channels of contamination.
Rating	Conformance
Conclusion	Adequate and effective process are in place to record, characterize, and monitor water sources, water discharge and control channels of contamination.
Data Points	<p>Data point 1: Site observation: The facility uses the water source of the municipal pipeline network. According to on-site observations and environmental impact assessment documents, Industrial wastewater and domestic wastewater is treated in accordance with permit requirements.</p> <p>Data point 2: Record review: Water and wastewater inventory records are: a) Accurate. b) Maintained.</p> <p>Data point 3: Record review: Wastewater inspection records are: a) Accurate. b) Maintained. c) Available for each wastewater. d) Available for each point of storage of wastewater. e) Showing the process and administrative controls are effective.</p> <p>Data point 4: Record review: No wastewater needs to be shipping.</p> <p>Data point 5: Record review: Spill and water channel contamination log is a) Accurate. b) Maintained. c) Listing all potential contamination sources to water channels. d) Listing all water channel contamination sources. e) Describing spills and water channel contamination.</p> <p>Data point 6: Management interview: EHS Manager confirms the audit observations.</p> <p>Data point 7: Worker interview: 22 out of 22 workers (including 1 worker who handle wastewater) confirm the audit observations.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

C6) ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Question #	VAP-C6.1
Question Text	Energy consumption and all scopes 1, 2, and significant categories of Scope 3 Greenhouse gas (GHG) emissions are tracked, documented, and publicly reported against an absolute corporate-wide GHG reduction goal.
Rating	Major Non-Conformance
Conclusion	Energy consumption and all scopes 1, 2, Greenhouse gas (GHG) emissions are tracked, documented, and publicly reported against an absolute corporate-wide GHG reduction goal. However, the significant scope 3 category 1 are not tracked, documented.
Data Points	<p>Data point 1: Site observation: Engineering controls are adequate and effective.</p> <p>Data point 2: Record review: Energy consumption and all scopes 1, 2, Greenhouse gas (GHG) emissions are tracked, documented, and publicly reported against an absolute corporate-wide GHG reduction goal, however, the significant scope 3 category 1 are not tracked, documented.</p> <p>Data Point 3: Management interview: EHS Manager confirms the audit observations.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

C.M.1) RISK ASSESSMENT

Question #	VAP-C.M.1.1
Question Text	An adequate and effective environment compliance process is established to monitor, identify, understand and ensure compliance with applicable laws and regulations and customer requirements.
Rating	Conformance
Conclusion	An adequate and effective environment compliance process is established to monitor, identify, understand and ensure compliance with applicable laws and regulations and customer requirements.
Data Points	<p>Data point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) states the facility needs to obtain, identify, assess, integrate, implement and update legal requirements and other requirements to ensure the operation activity conform to environment management system regularly. New/changed operations requires to be reviewed for applicable regulatory and customer requirements before start-up.</p> <p>Data point 2: Record review: All the legal and customers' special requirements on environment are also collected and identified in the list and the refresh review records show that the facility reviews them regularly.</p> <p>Data point 3: Management interview: EHS Manager states the facility establishes the law/regulation compliance evaluation procedure, they work together with environment team to collect and review the law & regulation & review the customer requirements regularly.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.1.2
Question Text	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential environmental risks where the facility caused or contributed to adverse environmental impacts for internal and external stakeholders (including applicable requirements).
Rating	Conformance
Conclusion	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential environmental risks where the facility caused or contributed to adverse environmental impacts for internal and external stakeholders (including applicable requirements).
Data Points	<p>Data point 1: Record review: EHS risk Identification and Assessment Management Procedure (Doc. No: LY-RBA-COP026, Rev. 00/1, Issue date: November 10, 2023) states risk management process to identify, assess and minimize, monitor and control risks on environment, and the risk assessment is conducted at least once per year as per the procedure.</p> <p>Data point 2: Record review: Risk assessment reports show that the facility identifies the high risks on environment and establishes the procedural controls and action plans to control and minimize the identified risks for all operation process and working areas. The corrective action noted during risk assessments are taken and tracked with documented records. Training materials and records show that workers and managers are trained with responsibilities for implementing the controls and actions.</p> <p>Data point 3: Management interview: EHS Manager states the identified high risks on environment and are known by risk assessment and they establish a long-time control plan to reduce the risks. The corrective actions are taken and tracked with documented records.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

C.M.2) CONTROL PROCESSES

Question #	VAP-C.M.2.1
Question Text	Environment responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.
Rating	Conformance
Conclusion	Environment responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.
Data Points	<p>Data point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) states the environment responsibilities and authorities for the top management of managers and supervisor, shift leader and workers.</p> <p>Data point 2: Record review: Training plan and records are available for review including the environment responsibilities and authorities training for different level/rank of employees in normal and emergency situations.</p> <p>Data point 3: Management interview: EHS Manager states environment responsibilities and authorities for different level/rank of employees, including manager, supervisor, shift leader and workers within the organization. The environment responsibilities and reporting lines are regulated in the management system and manuals. The management system can be overridden under specific emergency situations and life-threatening conditions.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state they know the direct reporting channel and their environment responsibilities and authorities for their own positions. The senior management who is responsible for execution and management for each component.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.2.2
Question Text	Adequate and effective environment policies and control processes are established.
Rating	Conformance
Conclusion	Adequate and effective environment policies and control processes are established.
Data Points	<p>Data point 1: Record review: EHS operation control procedure (Doc. No: LYKJ-CX-15, Rev. B/0, Issue date: December 1, 2023) states the environment policies and control processes. The policies and control processes are effectively implemented.</p> <p>Data point 2: Management interview: EHS Manager states environment policies and control processes are established and effectively implemented.</p> <p>Data point 3: Worker interview: 22 out of 22 workers state environment policies and control processes are established.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.2.3
Question Text	An adequate and effective environment training process is established for all managers/workers on all policy/process/job related aspects and performance targets.
Rating	Conformance
Conclusion	An adequate and effective environment training process is established for all managers/workers on all policy/process/job related aspects and performance targets.
Data Points	<p>Data point 1: Record review: Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) states the training to employees and the communication with workers. Training plans are made each year per training needs analysis. Annual review and interviews/tests after trainings are conducted to verify the training efficiency.</p> <p>Data point 2: Record review: Training plan, training records and training materials show that the facility conducts environment training for all employees before taking the job and regularly.</p> <p>Data point 3: Management interview: EHS Manager states the facility communicates RBA performance objectives and targets with workers through orientation training and annual refreshing training, and with suppliers through emails and meetings. Training</p>

	<p>needs analysis is made per the review results of last year's trainings and updates on facility conditions and legal/customer requirements. The facility conducts RBA training for all employees before taking the job and regularly, training contents include environment training.</p> <p>Data point 4: Worker interview: 22 out of 22 workers state the facility conducts RBA training for all of them before taking the job and regularly, training contents include environment training. The facility will verify their understanding by interviews/tests after trainings.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>
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C.M.3) COMMUNICATIONS

Question #	VAP-C.M.3.1
Question Text	An adequate and effective ongoing two-way communication process with workers, internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational environmental practices and conditions and to foster continuous improvement.
Rating	Conformance
Conclusion	An adequate and effective ongoing two-way communication process with workers, internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational environmental practices and conditions and to foster continuous improvement.
Data Points	<p>Data Point 1: Site observation: Feedback channels are clearly communicated and visible in the facility.</p> <p>Data point 2: Record review: Internal and External Communication Control Procedure (Doc. No: LYKJ-CX-16, Rev. B/0, Issue date: December 1, 2023) states the communication, feedback & participation, the training to workers/employees and the communication with suppliers and customers on RBA code, performance objectives and targets, which are updated annually. CSR code is also posted in announcement board. The requirement of conforming to the RBA code and applicable laws are included in agreements with suppliers, which is consistent with the supplier management requirement.</p> <p>Data point 3: Management interview: EHS Manager states they communicate and train all employees and suppliers on RBA. The communications between factory and suppliers and customers are completed by emails and meetings.</p> <p>Data point 4: Worker interview: 22 out of 22 workers can state the requirements of CSR code of conduct and know where they can find the information about the code of conduct.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.3.2
Question Text	An adequate and effective process is established to anonymously report environmental grievances confidentially without fear of reprisal or intimidation.
Rating	Conformance
Conclusion	An adequate and effective process is established to anonymously report environmental grievances confidentially without fear of reprisal or intimidation.
Data Points	<p>Data point 1: Record review: Complaint Management Procedure (Doc. No: LY-RBA-COP008, Rev. 0/1, Issue date: November 10, 2023) states the confidential environment grievance without fear of reprisal or intimidation.</p> <p>Data point 2: Record review: No environment grievance case in the past 12 months.</p> <p>Data point 3: Management interview: EHS Manager states an adequate and effective confidential environment grievance without fear of reprisal or intimidation is established. No environment grievance case in the past 12 months.</p> <p>Data point 4: Worker interview: 22 out of 22 workers can state they know the grievance process and they do not have environment grievance in the past 12 months.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

C.M.4) PERFORMANCE REVIEW AND CONTINUOUS IMPROVEMENT

Question #	VAP-C.M.4.1
Question Text	An adequate and effective environment management performance review and continuous improvement process is established.
Rating	Conformance
Conclusion	An adequate and effective environment management performance review and continuous improvement process is established.
Data Points	<p>Data point 1: Record review: Management review control procedure (Doc. No: LYKJ-CX-03, Rev. B/0, Issue date: December 1, 2023) states the top management is responsible for periodically management review of the environment management system, to ensure the suitability, adequacy and effectiveness of the systems. An adequate and effective management review and continuous improvement process for environment is established.</p> <p>Data point 2: Management interview: EHS Manager states the management review is conducted at least once per year which included the RBA standards, local law and customer requirements.</p> <p>Data point 3: Worker interview: 22 out of 22 workers state they are aware of performance objectives, targets and implementation plans.</p> <p>Legal references: N/A Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.4.2
Question Text	An adequate and effective environmental self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.

Rating	Conformance
Conclusion	An adequate and effective environmental self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Data Points	<p>Data point 1: Record review: Internal Audit Control Procedure (Doc. No: LYKJ-CX-04, Rev. B/0, Issue date: December 1, 2023) states the frequency for internal audit on environment components is once per year based on all applicable requirement (including local law, RBA Code, customer requirement, facility own requirement), and it shall include all areas of the facility, all operation processes, review of documents and records and worker interviews covering environment.</p> <p>Data point 2: Record review: Audit Checklist shows that the facility has conducted self-assessment of environment. The internal audit plan, agenda, checklist, meeting minutes, corrective actions for identified findings are provided for review, covering environment.</p> <p>Data point 3: Management interview: EHS Manager states their RBA team has formal self-audit program on environment, which is conducted at least once per year.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

Question #	VAP-C.M.4.3
Question Text	An adequate and effective environmental corrective action process is established to rectify and close non-conformances.
Rating	Conformance
Conclusion	An adequate and effective environmental corrective action process is established to rectify and close non-conformances.
Data Points	<p>Data point 1: Record review: Corrective and Preventive Actions Control Procedure (Doc. No: LYKJ-CX-05, Rev. B/0, Issue date: December 1, 2023) states corrective and preventive action will be taken for any non-conformance on environment identified in internal and external audit. The corrective and preventive actions shall be track and for off track incidents, facility shall take additional actions to get back on schedule. The records are required to keep for at least 3 years.</p> <p>Data point 2: Record review: Corrective action records in last internal audit conducted shows that corrective actions are implemented; the corrective action report includes root cause analysis, specific actions, owner, target date, evidence of action taken and tracking on the action status. The implementation of corrective actions is verified by the system improvement team. The corrective actions taken are linked with facility's continuous improvement objectives.</p> <p>Data point 3: Management interview: EHS Manager states corrective and preventive action will be taken for any non-conformance on environment identified in internal and external audit. They can state the process of corrective action plan and corrective action is in process now.</p> <p>Legal references: N/A</p> <p>Supporting evidence reference(s): N/A</p>

D) Ethics

D1) BUSINESS INTEGRITY AND NO IMPROPER ADVANTAGE

Question #	VAP-D1.1
Question Text	No identified risk or evidence of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted.
Rating	Conformance
Conclusion	No identified risk or evidence of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted.
Data Points	<p>Data Point 1: Record review: Business Ethic Management Procedure (Doc. No: LY-RBA-COP046, Rev. 0/1, Issue date: November 10, 2023) stipulates the policy on highest integrity business standards and zero tolerance on all forms of bribery, corruption, extortion and embezzlement.</p> <p>Data point 2: Record review: Gift Policy (Doc. No: LY-RBA-COP063, Rev. 0/1, Issue date: November 10, 2023) states that any bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted is not allowed.</p> <p>Data Point 3: Management interview: HR Manager states the detail of the Gift Policy & Business Ethic Management Procedure to/ or from suppliers and customers is not allowed, any bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted is not allowed as well. All workers and supervisors are trained for facility gift policy via orientation and refresh training.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers state that the facility has Gift Policy & Business Ethic Management Procedure, and they have never heard any case of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted. And they know the facility has integrity business standards and formal procedures to protect the misconducts reporters and they are encouraged to declare a conflict of interest.</p> <p>Legal references: NA</p> <p>Supporting evidence reference(s): NA</p>

D2) DISCLOSURE OF INFORMATION

Question #	VAP-D2.1
Question Text	No evidence of misreporting, record falsification, misrepresentation or evidence of communicating inaccurate information to the public
Rating	Conformance
Conclusion	No evidence of misreporting, record falsification, misrepresentation or evidence of communicating inaccurate information to the public.

Data Points	Data Point 1: Site observation: Public information posted is accurate.
	Data Point 2: Record review: 2 out of 2 notices covering the period Aug. 2023 to Aug. 2024 demonstrate a) All information is accurate b) All publicly communicated information is accurate.
	Data Point 3: Record review: Annual financial report (Doc. No.:Nil, Rev. Nil, Issue date: Mar. 15, 2024) a) About the Auditee's business operations is available b) Does not show discrepancy with other facility information.
	Data Point 4: Management interview: HR Manager confirms the audit observations.
	Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

D3) INTELLECTUAL PROPERTY

Question #	VAP-D3.1
Question Text	No evidence of Intellectual Property or business information loss or unauthorized disclosure (the Reviewee's own and that of their customers/suppliers).
Rating	Conformance
Conclusion	No evidence of Intellectual Property or business information loss or unauthorized disclosure (the Auditee's own and that of their customers/ suppliers).
Data Points	Data Point 1: Site observation: a) IP information is visibly protected b) business information visibly protected.
	Data Point 2: Record review: Intellectual Property Control Procedure (Doc. No: LY-RBA-COP050, Rev. 0/1, Issue date: November 10, 2023) states a) Is adequate b) Is effective c) Includes administrative control and d) IT control e) to access IT systems and f) to access IP g) of business information.
	Data Point 3: Record review: 24 workers' employment contracts demonstrate non-disclosure agreement for workers and management is written in labor contracts. One client's Declaration of Conformances demonstrate non-disclosure and intellectual property requirements is involved.
	Data Point 4: Management interview: HR Manager confirms the audit observations.
	Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

D4) FAIR BUSINESS, ADVERTISING AND COMPETITION

Question #	VAP-D4.1
Question Text	No identified risk or evidence of non-conformance with fair business, advertising and competition standards.
Rating	Conformance
Conclusion	No identified risk or evidence of non-conformance with fair business, advertising and competition standards.
Data Points	Data Point 1: Fair Business, Advertising and Competition Procedure (Doc. No: LY-RBA-COP058, Rev. 0/1, Issue date: November 10, 2023) states that the facility must ensure fair business, advertising and competition standards in line with requirement, and the issued advertising statements are not false or misleading, marketing department responsible to issue the advertising, and advertisements to be published should respect China advertising law, regulations and rules.
	Data Point 2: Record review: The recruitment advertisement Job Description shows that all the information is accurate, not misleading, compliance with facility actual condition and in line with legal and ethics requirements.
	Data Point 3: Management interview: HR Manager confirms the audit observations.
	Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

D5) PROTECTION OF IDENTITY AND NON-RETALIATION

Question #	VAP-D5.1
Question Text	No evidence of retaliation or reduced protection of identity.
Rating	Conformance
Conclusion	No evidence of retaliation or reduced protection of identity.
Data Points	Data Point 1: Record review: No Retaliation or Reduced Protection of Identity Management Procedure (Doc. No: LY-RBA-COP060, Rev. 0/1, Issue date: November 10, 2023) states the detail process for ensuring protection of identity and non-retaliation are in place including that any person including facility supplier report on ethical misconduct will be non-retaliation in the facility. The procedure includes protect whistleblower identity as part of the allegation investigation process.

	Data Point 2: Record review: No grievance investigation records due to no ethics violation/ feedback in previous 1 year.
	Data Point 3: Management interview: HR Manager confirms the audit observations.
	Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

D6) PRIVACY

Question #	VAP-D6.1
Question Text	No evidence of unauthorized disclosure of personal information.
Rating	Conformance
Conclusion	No evidence of unauthorized disclosure of personal information.
Data Points	Data Point 1: Site observation: Personal information is visibly protected. Data Point 2: Record review: Information Safety Management Procedure (Doc. No: LY-RBA-COP023, Rev. 0/1, Issue date: November 10, 2023) states that the facility is able to protect all employees and business partners' (including suppliers, customers, consumers) privacy. Data Point 3: Management interview: HR Manager confirms the audit observations. Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations. Legal references: NA Supporting evidence reference(s): NA

D.M.1) RISK ASSESSMENT

Question #	VAP-D.M.1.1
Question Text	An adequate and effective ethics compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Rating	Conformance
Conclusion	An adequate and effective ethics compliance process is established to monitor, identify, understand, and ensure compliance with applicable laws, regulations, and customer requirements.
Data Points	Data Point 1: Record review: Law & Related Requirement Collection Regulation (Doc. No: LY-RBA-COP024, Rev. 0/1, Issue date: November 10, 2023) stipulates that the facility should collect relevant legal law and customer requirements to ensure their ethics aspects compliance with applicable laws, regulations, and customer requirements. Data Point 2: Record review: All the legal and customers' special requirements on ethics are collected and identified in the list and the refresh review records show that the facility reviews them regularly. Data Point 3: Management interview: HR Manager states the facility establishes the Law & Related Requirement Collection Regulation, and conducted the law, regulation, customer requirements compliance evaluation regularly Legal references: NA Supporting evidence reference(s): NA

Question #	VAP-D.M.1.2
Question Text	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential ethics risks where the facility caused or contributed to adverse ethics impacts (including applicable requirements).
Rating	Conformance
Conclusion	An adequate and effective due diligence process is established to identify and assess the most significant actual and potential ethics risks where the facility caused or contributed to adverse ethics impacts (including applicable requirements).
Data Points	Data Point 1: Labor and Ethic Risk Assessment& Management Procedure (Doc. No: LY-RBA-COP020, Rev. 00/1, Issue date: November 10, 2023) stipulates the facility conducts risk identification and assessment procedure on ethic at least once per year. Data Point 2: Record review: Risk Assessment Sheet (Document No.: Nil, Revision: Nil, date: Dec.5, 2023) shows that the management has analyzed the risks in the existing ethical system and proposed control measures and responsible departments. Data Point 3: Management interview: HR Manager confirms the facility conducts ethic risk assessment annually, and has preventive action plan to control the high risk one. Legal references: NA Supporting evidence reference(s): NA

D.M.2) CONTROL PROCESSES

Question #	VAP-D.M.2.1
Question Text	Ethics responsibilities and authorities are adequately and effectively defined and assigned for all employee levels (senior managers to workers) for the implementation of management systems, and for compliance with laws, regulations, and codes.

Rating	Conformance
Conclusion	Ethics responsibilities and authorities are adequately and effectively defined and assigned for all employees levels (senior managers to workers) for the implementation of the management systems, and for compliance with laws, regulations and codes.
Data Points	<p>Data Point 1: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) states GM is responsible for implementing programs a) To ensure compliance with laws and regulations and RBA requirements; b) Is authorized to implement programs, procedures and corrective actions as needed for regulatory compliance and RBA conformance. It also defines the responsibilities and authorities, job description for the top management of managers, supervisor, leaders, and other levels of employees which is compliance with laws and RBA codes pertaining to Ethics, the responsibility assignment is defined as normal situation and standby for emergency situation.</p> <p>Data Point 2: Record review: Organizational chart and description confirms a) Responsibilities of each organizational level are recorded b) Authorities of each organizational level are recorded c) For regular and emergency situations.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-D.M.2.2
Question Text	Adequate and effective ethics policies and control processes are established.
Rating	Conformance
Conclusion	Adequate and effective ethics policies and control processes are established.
Data Points	<p>Data Point 1: Record review: Business Ethic Management Procedure (Doc. No: LY-RBA-COP046, Rev. 0/1, Issue date: November 10, 2023) a) Is adequate b) Is effective c) For every ethics alleged violation d) Appropriate sanctions are taken when an ethics violation is confirmed e) Preventive action plan is implemented when an ethics violation is confirmed.</p> <p>Data Point 2: Record review: No grievance investigation records due to no ethics violation in previous 1 year.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-D.M.2.3
Question Text	An adequate and effective ethics training process is established for all managers/workers on all policy/process/job related aspects and performance targets.
Rating	Conformance
Conclusion	An adequate and effective ethics training process is established for all managers/ workers on all policy /process/ job-related aspects and performance targets.
Data Points	<p>Data Point 1: Record review: The Employee Manual (Doc. No.: Nil, Rev. Nil, Date: May 1, 2023) indicates the facility provides the recruitment and regular training to all employees, which including: RBA standards, facility policy, job related aspects and performance targets.</p> <p>Data Point 2: Record review: 10 out of 10 training records in period of Aug.2023 to Aug. 2024 show that all levels of employees (management and workers) are provided the recruitment training and refresh training annually on all policy /procedures/ process/ job related aspects and performance targets related to ethics.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

D.M.3) COMMUNICATIONS	
Question #	VAP-D.M.3.1
Question Text	An adequate and effective ongoing two-way communication process with workers, internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational ethics practices and conditions and to foster continuous improvement.
Rating	Conformance
Conclusion	An adequate and effective ongoing two-way communication process with workers, internal and external stakeholders, where relevant or necessary, is established to obtain feedback on operational ethics practices and conditions and to foster continuous improvement.
Data Points	<p>Data Point 1: Site observation: Feedback channels are clearly communicated and visible.</p> <p>Data Point 2: Record review: Complaint Management Procedure (Doc. No: LY-RBA-COP008, Rev. 0/1, Issue date: November 10, 2023) stipulates that the communication, feedback & participation, the training to employees and the communication with suppliers and customers on ethics, performance objectives and targets, which are updated annually.</p> <p>Data Point 3: Record review: 10 out of 10 ethics training and communication records in the period of Aug. 2023 to Aug. 2024</p>

	<p>show that the facility communicates their ethics policy, objectives and status to their suppliers; mails show that the facility communicates their ethics policy, objectives and yearly ethics performance to their key customers by net sharing; internal training shows that the facility communicates their ethics policy, objectives and status to their own employees.</p> <p>Data Point 4: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 5: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>
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Question #	VAP-D.M.3.2
Question Text	An adequate and effective process is established to anonymously report ethics grievances confidentially without fear of reprisal or intimidation.
Rating	Conformance
Conclusion	An adequate and effective process is established to anonymously report ethics grievances confidentially without fear of reprisal or intimidation.
Data Points	<p>Data Point 1: Record review: Complaint Management Procedure (Doc. No: LY-RBA-COP008, Rev. 0/1, Issue date: November 10, 2023) states the confidential Ethics grievance without fear of reprisal or intimidation.</p> <p>Data Point 2: Record review: No grievance case on ethic in the past 12 months.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Data Point 4: Worker interview: 24 out of 24 workers confirm the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

D.M.4) PERFORMANCE REVIEW AND CONTINUOUS IMPROVEMENT

Question #	VAP-D.M.4.1
Question Text	An adequate and effective ethics management performance review and continuous improvement process is established.
Rating	Conformance
Conclusion	An adequate and effective ethics management performance review and continuous improvement process is established.
Data Points	<p>Data Point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) a) Is adequate b) Is effective c) Defines the annual review process: c.a) By senior management: c.b) Of the management system c.c) Of the performance d) Mandates additional action plans if objective is off track.</p> <p>Data Point 2: Record review: Annual Management assessment (Doc. No.: Nil, Rev. Nil, Date: Jun.28, 2024) shows that no ethics performance action plan is required because of no violation is identified.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-D.M.4.2
Question Text	An adequate and effective ethics self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Rating	Conformance
Conclusion	An adequate and effective ethics self-audit process is established to assess conformance with the RBA Code and customer requirements periodically.
Data Points	<p>Data Point 1: Record review: Internal Assessment Management Procedure (Doc. No: LY-RBA-COP036, Rev. 00/1, Issue date: November 10, 2023) a) Is adequate b) Is effective c) Mandates periodically assess conformance with: c.a) Applicable regulatory requirements c.b) RBA Code requirements c.c) Own policies, standards and management system c.d) Other requirements to which the facility subscribes d) States audit findings are reviewed by senior management.</p> <p>Data Point 2: Record review: Internal Audit Report (Document No.: Nil, Rev. Nil, date: Jun.3, 2024) indicates no ethics finding was found.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

Question #	VAP-D.M.4.3
Question Text	An adequate and effective ethics corrective action process is established to rectify and close non-conformances.
Rating	Conformance

Conclusion	An adequate and effective ethics corrective action process is established to rectify and close non-conformances.
Data Points	<p>Data Point 1: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) a) Is adequate b) Is effective c) Defines the corrective action plans and tracking tables d) Mandates additional actions are taken when a corrective action is off-track e) Requires a demonstrated link between the CAP and the performance management objectives and targets. f) States all actions must be verifiably closed g) Requires closure of action items is confirmed by a management representative after verification by the appropriate person h) Mandates if any non-conformance is confirmed, a recorded corrective action is implemented.</p> <p>Data Point 2: Record review: No corrective action record is available for no non-compliances is found on ethics.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

E) Supply Chain

E1) COMPANY COMMITMENT

Question #	VAP-E1.1
Question Text	An adequate and effective Code of Conduct is established and endorsed by executive management covering all elements of the RBA code.
Rating	Conformance
Conclusion	An adequate and effective Code of Conduct is established and endorsed by executive management covering all elements of the RBA code.
Data Points	<p>Data Point 1: Site observation: a) Code of Conduct in RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) is in a language understood by each worker b) Code of Conduct is visible to all workers c) Code of Conduct is publicly available.</p> <p>Data Point 2: Record review: RBA Management Manual (Doc. No: LY- RBA -000, Rev. 0/1, Issue date: August 15, 2017) a) Covering all elements of the RBA code. b) Endorsed by the highest-level manager at the facility. c) Includes a stated commitment to c.a) Due diligence c.b) Access to remedy for c.b.a) Internal and c.b.b) External stakeholders c.b.d) where the participant c.b.d.a) caused or contributed to c.b.d.b) adverse human rights or environmental impacts. c.c) Continuous improvement d) Appropriate for the nature and scope of the facility's operations.</p> <p>Data Point 3: Management interview: HR Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

E2) MATERIALS RESTRICTIONS

Question #	VAP-E2.1
Question Text	An adequate and effective program is in place for Materials Restrictions as a formal part of the procurement and manufacturing processes.
Rating	Conformance
Conclusion	Adequate and effective program is in place for materials restrictions as a formal part of the procurement and manufacturing processes.
Data Points	<p>Data Point 1: Record review: Purchase Management Regulation (Doc. No.MH-SY-001, Version: Nil, Date: Jan.5, 2024) a) Is adequate b) Is effective c) Requires chemical composition of materials d) Requires chemical composition of packaging e) Requires chemical composition of components f) Requires chemical composition of products g) Requires conformance with customer requirements h) Requires conformance with legal requirements i) Comparing customer requirements to own specifications.</p> <p>Data Point 2: Record review: 2 out of 2 RoHS/ REACH test reports for raw materials show that the results comply with the RoHS/ REACH Directive requirements.</p> <p>Data Point 3: Record review: No material restriction action plan is required because of no finding observed in the last 24 months.</p> <p>Data Point 4: Management interview: Quality Manager confirms the audit observations.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

E3) RESPONSIBLE SOURCING OF MINERALS

Question #	VAP-E3.1
Question Text	An adequate and effective Conflict Minerals Supply Chain Policy and Management System is designed and implemented to reasonably assure that the tantalum, tin, tungsten, gold, and Cobalt (3TG+C) in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) or an equivalent and recognized due diligence framework.
Rating	Conformance
Conclusion	An adequate and effective Conflict Minerals Supply Chain Policy and Management System is designed and implemented to reasonably assure that the tantalum, tin, tungsten, gold, and Cobalt (3TG+C) in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) or an equivalent and recognized due diligence framework.

Data Points	Data Point 1: Record review: Conflict Minerals Supply Chain Management Procedure (Doc. No: LY-RBA-COP057, Rev. 00/1, Issue date: November 10, 2023) is a) Adequate. b) Effective. c) Covering all 3TG+C included in the facility's products. d) Designed to reasonably assure the 3TG+C in the products they manufacture are sourced in a way consistent with the OECD Due Diligence Guidance or an equivalent. e) Implemented through a recognized due diligence framework. f) Communicated to suppliers. g) Communicated to the public. h) Facility commitment to exercise due diligence on the source of minerals in accordance with the OECD Due Diligence Guidance. i) Facility commitment to exercise due diligence on the chain of custody of minerals in accordance with the OECD Due Diligence Guidance.
	Data Point 2: Record review: 2 out of 2 due diligence reports for the suppliers demonstrate due diligence records related to conflict minerals are maintained and are available since it is set up and show consistent implementation of conflict minerals management procedure.
	Data Point 3: Record review: No conflict mineral action plan is required because of no finding observed since it is set up.
	Data Point 4: Management interview: Quality Manager confirms the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

E4) SUPPLIER RESPONSIBILITY

Question #	VAP-E4.1
Question Text	The RBA Code requirements have been communicated to the next tier suppliers.
Rating	Conformance
Conclusion	The RBA Code requirements have been communicated to the next-tier suppliers.
Data Points	Data Point 1: Record review: Purchase Management Document (Doc. No.MH-SY-001, Version: Nil, Date: Jan.5, 2024) a) Is adequate b) Is effective c) Requires contracts for all next-tier suppliers c.a) With the enforcement of the implementation of the RBA Code provisions c.b) Contractors comply with legal requirements in both home and sending country d) Requires contract enforcement notification are issued to the next-tier supplier if a contract violation, including a violating of the RBA code provisions become known.
	Data Point 2: Record review: No contract enforcement notifications because of no contract violation finding in the past 12 months.
	Data Point 3: Management interview: Purchase Department Manager confirms the audit observations.
	Data Point 4: Worker interview: 2 out of 2 procurement staffs confirm the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

Question #	VAP-E4.2
Question Text	Next tier major suppliers have been identified.
Rating	Conformance
Conclusion	Next tier major suppliers have been identified.
Data Points	Data Point 1: Record review: Suppliers Risk Identification & Assessment Standard (Doc. No: LY-RBA-COP045, Rev. 0/1, Issue date: November 10, 2023) defines major suppliers should be identified and shall be conducted with RBA assessment.
	Data Point 2: Record review: Suppliers list (Document No.: Nil, Revision: Nil, Issue date: Aug.30, 2024) shows that the facility has identified major suppliers and no service provider/ sub-contractor in 2024.
	Data Point 3: Management interview: Purchase Department Manager confirms the audit observations.
	Legal references: NA Supporting evidence reference(s): NA

Question #	VAP-E4.3
Question Text	An adequate and effective process is established to ensure that the next-tier major suppliers implement the RBA Code.
Rating	Conformance
Conclusion	An adequate and effective process is established to ensure that the next-tier major suppliers implement the RBA Code.
Data Points	Data Point 1: Record review: Suppliers Risk Identification & Assessment Standard (Doc. No: LY-RBA-COP045, Rev. 0/1, Issue date: November 10, 2023) states the facility should conduct CSR audit of collect self-assessment records for/ from next-tier major suppliers, which covers all requirement of RBA Code of Conduct.
	Data Point 2: Record review: 2 out of 2 next-tier major suppliers self-assessment records and related improvement action plans prove that they implement the RBA Code.
	Data Point 3: Management interview: Purchase Department Manager states the facility has adequate and effective process to ensure that the next-tier major suppliers implement the RBA Code of Conduct.

	Legal references: NA Supporting evidence reference(s): NA
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Question #	VAP-E4.4
Question Text	An adequate and effective process is established to ensure suppliers' RBA Code implementation performance and continuous improvement.
Rating	Major Non-Conformance
Conclusion	The factory does not ensure suppliers' RBA Code implementation performance and continuous improvement.
Data Points	<p>Data Point 1: Record review: Purchase Management Document (Doc. No.MH-SY-001, Version: Nil, Date: Jan.5, 2024) states that the facility should monitor all suppliers' implementation performance and continuous improvement. But it is not implemented well.</p> <p>Data Point 2: Record review: 2 out of 2 suppliers assessment reports show that it does not monitor suppliers' RBA Code implementation performance and continuous improvement.</p> <p>Data Point 3: Management interview: Purchase Department Manager confirms the factory does not monitor suppliers' RBA Code implementation performance and continuous improvement.</p> <p>Legal references: NA Supporting evidence reference(s): NA</p>

General Info		
General Auditee Facility Information		
VAP-Info1.1	Auditee / Facility Name	Zhuhai Longyu Technology Co., LTD
VAP-Info1.2	Address	Zhuhai Longyu Technology Industrial Park, Chancheng 1st Road, Qianwu Town, Doumen District, Zhuhai City, Guangdong Province
VAP-Info1.3	Country	China
VAP-Info1.3a	GPS Coordinates of Facility Main entrance	N 22°11'49" E 113°8'1"
VAP-Info1.4	Facility Manager (Name & Title)	Not disclosed
VAP-Info1.5	Main Contact(s) for Audit (Name & Title)	Quality Department Engineer
VAP-Info1.6	email	Not disclosed
VAP-Info1.7	Telephone	Not disclosed
VAP-Info1.8	Auditee contact person who is authorized to approve and release the audit report: name	Quality Manager
VAP-Info1.9	Auditee contact person who is authorized to approve and release the audit report: email	Not disclosed
VAP-Info1.10	Auditee contact person who is authorized to approve and release the audit report: phone	Not disclosed
Population Size		
VAP-Info2.1	Population Size: Number of male workers	346
VAP-Info2.2	Population Size: Number of female workers	144
VAP-Info2.3	Population Size: Number of total workers	490
VAP-Info2.3a	Population Size: Number of male production supervisors	28
VAP-Info2.3b	Population Size: Number of female production supervisors	5
Population Characteristics		
VAP-Info3.3	Population Characteristics: Number of total workers under 18 years of age	0
VAP-Info3.6	Population Characteristics: Number of total student workers/apprentices/interns:	0
VAP-Info3.9	Population Characteristics: Number of total temporary workers	0
VAP-Info3.10	Population Characteristics: Number of male migrant workers	0
VAP-Info3.11	Population Characteristics: Number of female migrant labor	0
VAP-Info3.12	Population Characteristics: Number of total migrant labor	0
VAP-Info3.15	Population Characteristics: Number of total indirect labor	0
VAP-Info3.16	Population Characteristics: Nationalities of migrant labor	N/A
VAP-Info3.17	Population Characteristics: Language(s) spoken by workers	Mandarin

VAP-Info3.18	Population Characteristics: Language(s) spoken by management	Mandarin
Site Activities and Processes		
VAP-Info4.1	Site Activities and Processes: Total facility surface area (square meters)	74723.27
VAP-Info4.2	Site Activities and Processes: Total roofed facility surface area (square meters)	186550
VAP-Info4.3	Site Activities and Processes: Number of production buildings (describe)	One 5-storey production building
VAP-Info4.4	Site Activities and Processes: Component manufacturing(describe)	PCB board
VAP-Info4.5	Site Activities and Processes: Final Assembly (describe)	N/A
VAP-Info4.6	Site Activities and Processes: Metal Stamping / plating (describe)	N/A
VAP-Info4.7	Site Activities and Processes: PC Board manufacturing (describe)	1 whole PCB board production line
VAP-Info4.8	Site Activities and Processes: Painting/coating (describe)	2 plating production lines
VAP-Info4.9	Site Activities and Processes; Distribution/Logistics (describe)	N/A
VAP-Info4.10	Site Activities and Processes: Clean room (describe)	2 clean rooms with class 10000
VAP-Info4.11	Site Activities and Processes: Logistics & Distribution (describe)	N/A
VAP-Info4.12	Site Activities and Processes: Business Services - Office Equipment (describe)	N/A
VAP-Info4.13	Site Activities and Processes: Business Services - Branded Products (describe)	N/A
VAP-Info4.14	Site Activities and Processes: Business Services - Finance Related (describe)	N/A
VAP-Info4.15	Site Activities and Processes: Business Services - HR Related (describe)	N/A
VAP-Info4.16	Site Activities and Processes: Legal Related (describe)	N/A
VAP-Info4.17	Site Activities and Processes: Fleet Related (describe)	N/A
VAP-Info4.18	Site Activities and Processes: Real Estate Construction (describe)	N/A
VAP-Info4.19	Site Activities and Processes: Real Estate Maintenance (describe)	N/A
VAP-Info4.20	Site Activities and Processes: Business Services - Real Estate Security (describe)	N/A
VAP-Info4.21	Site Activities and Processes: Business Services - Facility Management (describe)	N/A
VAP-Info4.22	Site Activities and Processes: Business Services - Rent/Lease (describe)	N/A
VAP-Info4.23	Site Activities and Processes: Hardware - Product Related (describe)	N/A
VAP-Info4.24	Site Activities and Processes: Hardware - Maintenance Related (describe)	N/A
VAP-Info4.25	Site Activities and Processes: Hardware - Reseller/Distributor (describe)	N/A
VAP-Info4.26	Site Activities and Processes: Sales/Marketing Services (describe)	N/A
VAP-Info4.27	Site Activities and Processes: Printing Services (describe)	N/A
VAP-Info4.28	Site Activities and Processes: Printing Materials & Supplies (describe)	N/A
VAP-Info4.29	Site Activities and Processes: Professional Services - Consultant (describe)	N/A
VAP-Info4.30	Site Activities and Processes: Professional Services - Contact Center (describe)	N/A
VAP-Info4.31	Site Activities and Processes: Professional Services - Sales & Support (describe)	N/A
VAP-Info4.32	Site Activities and Processes: Technology Outsourced Services (describe)	N/A
VAP-Info4.33	Site Activities and Processes: Contract Outside Labor (describe)	N/A
VAP-Info4.34	Site Activities and Processes: Software - Product/License (describe)	N/A
VAP-Info4.35	Site Activities and Processes: Software - Maintenance & Support (describe)	N/A
VAP-Info4.36	Site Activities and Processes: Software - Application Service Provider (describe)	N/A
VAP-Info4.37	Site Activities and Processes: Telecom - Maintenance and Managed Services (describe)	N/A
VAP-Info4.38	Site Activities and Processes: Telecom - Mobility (describe)	N/A

VAP-Info4.39	Site Activities and Processes: Telecom - Voice and Data Transport (describe)	N/A
VAP-Info4.40	Site Activities and Processes: Travel Related Services (describe)	N/A
VAP-Info4.41	Site Activities and Processes: Services / Other (describe)	N/A
Primary Types of Operation		
VAP-Info5.1	Primary types of Operation: Chemical (describe)	CP H2SO4 (1000kg), printing solvent (200kg), screen washing agent (320kg), NaCO3 (1200kg), NaOH (500kg), HNO3 (400kg)
VAP-Info5.2	Primary types of Operation: Mechanical (describe)	drilling machines (78 sets), plating production lines (2), LED automatic alignment exposure machines (6 sets), automatic developing machines (7 sets), pressing machine (1 set), cutting machine (1 set), browning line (1), gamma ray drilling machines (3 sets), silk-screen printing machine (16 sets), forming machines (21 sets), tunnel oven (2 sets).
VAP-Info5.3	Primary types of Operation: Finishing (describe)	Testing machines (19 sets), hole checking machines (4 sets), vacuum package machines (2 sets)
VAP-Info5.4	Primary types of Operation: Assembly (describe)	Nil
VAP-Info5.5	Primary types of Operation: Other (describe)	Nil
On-Site Services		
VAP-Info6.1	On-Site Services: Fire brigade/warden team (description)	10 team members (day shift:5, night shift:5)
VAP-Info6.2	On-Site Services: Hospital/infirmary (description)	The nearest one: Zhuhai City Fifth People's Hospital is about 16 km far away from the facility. Adequate trained first aiders in the facility.
VAP-Info6.3	On-Site Services: Chemical Spill Response Team (description)	A chemical spill response team with 4 team members (day shift: 2, night shift: 2) is available.
VAP-Info6.4	On-Site Services: Wastewater treatment type (description)	Industrial wastewater treatment station: Physicochemical and biochemical treatment
VAP-Info6.5	On-Site Services: Power Generation (description)	one power generation
VAP-Info6.6	On-Site Services: Dormitory (# people + description)	One 6-storey dormitory building with 96 bedrooms and 312 people living in.
VAP-Info6.7	On-Site Services: Canteen (description)	The canteen was at 1F of dormitory building (860 Square meters with 384 seats).
VAP-Info6.8	On-Site Services: Kitchen (description)	The kitchen was at 1F of dormitory building (250 Square meters with 8 chefs)
VAP-Info6.9	On-Site Services: Recycling (description)	Nil
VAP-Info6.10	On-Site Services: Other (description)	Nil
Certifications		
VAP-Info7	Please list all current certifications relating to labor, ethics, environment, and health & safety. Include Name and date valid until. Separate each with a hard enter.	GJB9001C-2017, Doc. No.0350123GJ30795R0M, valid from Oct.11, 2023 to Oct.10, 2026 ISO13485:2016, Doc. No.0350123MD10011R0M, valid from Oct.16, 2023 to Oct.15, 2026 IATF16949, Doc. No.0474662, valid from May 18, 2023 to May 17, 2026 ISO9001:2015: Doc. No.47422Q2143R0M, valid from Dec.16, 2022 to Dec.15, 2025 ISO14001:2015: Doc. No.47423E1194R0M, valid from Jul.25, 2023 to Jul.24, 2026 ISO45001:2018, Doc. No.47423S1195R0M, valid from Jul.25, 2023 to Jul.24, 2026
Consulting Services Used in Last Year		
VAP-Info8.0	For purposes of identifying any conflicts of interest, please state if you have used the audit firm company for consulting purposes over the last 1 year and / or since the last full RBA-based assessment.	Nil
Labor Agent/Contractor Services Used in Last 2 Years		
VAP-Info9.0	Please list the names of any recruiting / labor agents or brokers in the past 2 years or since the last full assessment.	Nil
Other Consulting Services Used in Last 3 Years		

VAP-Info10.0	Used Other consulting services in the last 3 years	No
VAP-Info10.1	Other consulting services used in last 3 years: Consulting description of work	0
VAP-Info10.2	Other consulting services used in last 3 years: Consulting firm (name and address)	0
VAP-Info10.3	Other consulting services used in last 3 years: Consulting started on (date - dd/mm/yyyy)	0
VAP-Info10.4	Other consulting services used in last 3 years: Consulting ended on (date - dd/mm/yyyy)	0
Audit Team: Lead Assessor		
VAP-Info11.1	Lead Assessor Name	Auditor-627
VAP-Info11.2	Lead Assessor Email	Not disclosed
VAP-Info11.3	Lead Assessor Phone	Not disclosed
VAP-Info11.4	Lead Assessor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)	CSCA21702092
VAP-Info11.5	Assessor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)	CSCA21702037
VAP-Info11.6	Assessment Firm APSCA Registration Number	11600006
Labor Assessor		
VAP-Info12.1	Labor Assessor Name	Auditor-627
VAP-Info12.2	Labor Assessor Email	Not disclosed
VAP-Info12.3	Labor Assessor Phone	Not disclosed
Ethics Assessor		
VAP-Info13.1	Ethics Assessor Name	Auditor-627
VAP-Info13.2	Ethics Assessor Email	Not disclosed
VAP-Info13.3	Ethics Assessor Phone	Not disclosed
Health and Safety Assessor		
VAP-Info14.1	Health and Safety Assessor Name	Auditor-631
VAP-Info14.2	Health and Safety Assessor Email	Not disclosed
VAP-Info14.3	Health and Safety Assessor Phone	Not disclosed
Environment Assessor		
VAP-Info15	Environment Assessor Name	Auditor-631
VAP-Info15.1	Environment Assessor Email	Not disclosed
VAP-Info15.2	Environment Assessor Phone	Not disclosed
Management Systems Assessor		
VAP-Info16.1	Management Systems Assessor Name	Auditor-627
VAP-Info16.2	Management Systems Assessor Email	Not disclosed
VAP-Info16.3	Management Systems Assessor Phone	#REF!
Staff Interviews		
VAP-Info17.1	Total number of interviews	24
VAP-Info17.2	Total number of interviews (male)	16
VAP-Info17.3	Total number of interviews (female)	8
VAP-Info17.4	Total number of interviews (direct workers)	24
VAP-Info17.5	Total number of interviews (indirect workers)	0
VAP-Info17.6	Total number of interviews (shift workers)	0
VAP-Info17.7	Total number of interviews (foreign migrant workers)	0
VAP-Info17.8	Total number of group interviews	0.0245
VAP-Info17.9	Total number of individual interviews	0.0245

Total Interviews		
VAP-Info17.10	Total interviews: Percentage of workforce (total)	0.049
Minimum Number of Interviews to Be Carried Out in this Audit		
VAP-Info18.1	Minimum number of interviews to be carried out in this audit	23
Process and Summary		
VAP-Info19.1	Process and summary: Management attitude	The facility management team shows an open and cooperative attitude for the entire audit process. They allow auditors to visit all the areas in audit scope, review related documents and conduct confidential workers interview.
VAP-Info19.2	Process and summary: Worker attitude	The facility managements agree that auditors conduct group and individual interviews with workers confidentially. Workers are chosen within the whole facility freely without any influence by the facility management. Auditors randomly select 24 workers from different production workshops, sex, age and positions for formal interview in a meeting room without being interrupted. All workers are open and cooperative during the interview, and all of them are satisfied with the benefits and work conditions of the facility.
VAP-Info19.3	Process and summary: Process Integrity	Nil
VAP-Info19.4	Process and summary: Closing meeting	The close meeting is held at 17:00 pm on Sep.6, 2024. HR Manager, Quality Department Manager, EHS Department Director, Management Department Supervisor, Quality Department Engineer attend the meeting. The audit result has been reviewed and agreed by the management during the closing meeting.
VAP-Info19.5	Process and summary: Exception management	One 4-storey production is still in decorating, which is not used till the audit.
VAP-Info19.6	Process and summary: Legal Nonconformance Risks	<p>List of legal nonconformance risks:</p> <p>A1.2 1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards.</p> <p>2.It written 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. But both labor contacts are kept in factory office without providing for workers.</p> <p>3.Unreasonable item in labor contact: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary.</p> <p>A3.1 Overtime working hours exceed local law requirement. The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The highest weekly working hours are 60 h/workweek. The maximum overtime hours are 2 h/ day and 92 h/month.</p> <p>a) 97.2% of workers do not meet local law regarding maximum monthly overtime.</p> <p>a.a) Average = 97.2% with a highest of 92 h/month.</p> <p>a.b) Oct. 2023 (random month) = 100% with a highest of 78 h/month</p> <p>a.c) Mar. 2024 (random month) = 92% with a highest of 92 h/month</p> <p>a.d) Jul. 2024 (average month) = 100% with a highest of 86 h/month.</p> <p>B1.1 The factory does not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building.</p> <p>B1.2 2 out of 2 board cutting workers does not wear ear-plug during operation. 4 out of 4 workers in solder mask workshop wear hygienic masks, instead of active carbon masks. One</p>

		<p>worker worked in silk print workshop does not wear active carbon mask. Based on interview, the factory provided ear-plugs and active carbon masks. But the workers do not wear PPEs because of PPEs are uncomfortable.</p> <p>B2.3 1) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. 2) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.</p> <p>B.M.3.1 3 out of 3 hazardous chemical sub-containers do not mark with safety label. The acetone in ink mixing room does not mark with safety label.</p>
VAP-Info19.7	Process and summary: Executive summary	<p>The audit of Zhuhai Longyu Technology Co., LTD evaluates the facility's labor, ethics, occupational health & safety and environmental practices, and supply chain systems against the RBA audit 8.0.0 criteria as contained in the RBA audit protocol and applicable laws and regulations. The audit takes place on Sep.5-6, 2024. 2 RBA auditors spend a total of 4 person-days onsite. No integrity issues are encountered. The audit findings are according to objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. The findings include 0 priority Non-conformance, 9 major Non-conformance and 0 minor Non-conformance against the audit criteria.</p> <p>Summary of Priority Findings: Nil</p> <p>Summary of major finding: A1.2 1.It lacks some content in labor contract: the time limit for the labor contract, job descriptions, payday, detail labor protection, working conditions and detail protection against occupational hazards. 2.It written 'Article 13 Other: The labor contract is signed in duplicate, with the factory and worker holding one copy'. But both labor contacts are kept in factory office without providing for workers. 3.Unreasonable item in labor contact: Resignation application one month in advance, urgent resignation will be deducted one month of basic salary.</p> <p>A3.1 Overtime working hours exceed local law requirement. The months of Oct. 2023 (random month), Mar. 2024 (random month) and Jul. 2024 (average month) are reviewed. The highest weekly working hours are 60 h/workweek. The maximum overtime hours are 2 h/ day and 92 h/month.</p> <p>a) 97.2% of workers do not meet local law regarding maximum monthly overtime. a.a) Average = 97.2% with a highest of 92 h/month. a.b) Oct. 2023 (random month) = 100% with a highest of 78 h/month a.c) Mar. 2024 (random month) = 92% with a highest of 92 h/month a.d) Jul. 2024 (average month) = 100% with a highest of 86 h/month.</p> <p>A.M.2.2 1.The Employee Manual (Date: May 1, 2023) is not updated in time, it lacks of below content: childcare leave and nursing leave. 2.Unreasonable items in the Employee Manual (Date: May 1, 2023), it does not set up lawful& reasonable items per legal requirement: Article 3.4.1 The one who resign within 1 year would be</p>

		<p>deducted working suits fee, RMB35/ pcs for summer suit and RMB50/ pcs for winter suit, and the factory would take back the working suit at the same time...The one who resign within 1 year would be deducted working shoes fee (RMB20/ pair).</p> <p>3. The working hours management system is not effectively implemented, it does not in line with <Working Hours Policy>.</p> <p>B1.1 The factory does not provide building acceptance registration/report for one 5-storey production building, one 6-storey office building and one 5-storey dormitory building.</p> <p>B1.2 2 out of 2 board cutting workers does not wear ear-plug during operation. 4 out of 4 workers in solder mask workshop wear hygienic masks, instead of active carbon masks. One worker worked in silk print workshop does not wear active carbon mask. Based on interview, the factory provided ear-plugs and active carbon masks. But the workers do not wear PPEs because of PPEs are uncomfortable.</p> <p>B2.3 1) 2 out of 20 safe exit doors are slide doors with sensor switches, including one safe exit door at office of 5F and another safe exit door at FQC workshop. 2) 2 out of 20 safe exit doors are not installed safe exit sign. The 2 safe exit doors are set in solder mask workshop.</p> <p>B.M.3.1 3 out of 3 hazardous chemical sub-containers do not mark with safety label. The acetone in ink mixing room does not mark with safety label.</p> <p>C6.1 Energy consumption and all scopes 1, 2, Greenhouse gas (GHG) emissions are tracked, documented, and publicly reported against an absolute corporate-wide GHG reduction goal. However, the significant scope 3 category 1 are not tracked, documented.</p> <p>E4.4 The factory does not ensure suppliers' RBA Code implementation performance and continuous improvement.</p> <p>Summary of Minor Findings: Nil</p>
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