

# Monitoring result for Shenzhen Comiso Digital Technology,.,Ltd. on site Shenzhen Comiso Digital Technology,.,Ltd.

## Monitoring

Monitored Party	: Shenzhen Comiso Digital Technology,.,Ltd.
amfori ID	: 156-042054-000
Site	: Shenzhen Comiso Digital Technology,.,Ltd.
Site amfori ID	: 156-042054-001
Address	: A area of 12/F & B area of 11/F, No, 13 Building, Xiaweishui Industrial Park, Hongqiaotou Community,SongGang Street, Baoan District
	: Shenzhen
	: Guangdong Sheng
	: China
Monitoring Activity	: amfori Social Audit - Manufacturing
Monitoring Type	: Full Monitoring
Monitoring Partner	: ALGI International, Inc.
Monitoring Start Date	: 09/11/2022
Closing Meeting Finished Date	: 09/11/2022
Submission Date	: 15/11/2022
Expiration Date	: 15/11/2023

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## Overall rating



## Section rating

PA1: Social Management System	C
PA 2: Workers Involvement and Protection	A
PA 3: The Rights of Freedom of Association and Collective Bargaining	A
PA 4: No Discrimination	A
PA 5: Fair Remuneration	A
PA 6: Decent Working Hours	D

PA 7: Occupational Health and Safety	A
PA 8: No Child Labour	A
PA 9: Special Protection for Young Workers	A
PA 10: No Precarious Employment	A
PA 11: No Bonded Labour	A
PA 12: Protection of the Environment	A
PA 13: Ethical Business Behaviour	A

## General description

Shenzhen Comiso Digital Technology.,Ltd. (Local name: 深圳市康米索数码科技有限公司, Uniform Code of Social Credit: 91440300066315806K) is located at A area of 12/F & B area of 11/F, No. 13 Building, Xiaweishui Industrial Park, Hongqiaotou Community, SongGang Street, Baoan District, Shenzhen City, Guangdong Province, China. The factory was established in 2013. It specializes in the manufacturing of bluetooth speaker. Main production activities include assembly, inspection and packing. No production process is subcontracted.

The factory currently consists of A area of 12/F & B area of 11/F of one 12-storey building as office, production site and warehouse. The factory did not provide dormitory and kitchen & canteen to workers. On the audit day, there were total 48 employees in the factory of which 34 employees were production workers. As per management interview and documents review, there is no obvious peak season and non-peak season in the factory.

Based on documents review and management interview, it was noted that all employees in the factory are paid by hourly rate. Wages are paid monthly in cash at the date of 7th of each month for the preceding month. The factory uses facial recognition attendance system to keep record of all employees' working hours. The regular working hours for all employees are from 8:10 to 17:40 with lunch break from 12:10 to 13:40. Overtime work is usually arranged for not more than 2 hours a day on normal working days and for 8 hours a day on Saturdays if needed.

During this audit, payroll records from November 2021 to October 2022 and attendance records from November 2021 to the audit date were provided for review. The auditor randomly selected 7 samples from October 2022 (recent paid month) and 7 samples from June 2022 (random month) and March 2022 (random month) for verification.

Mr. Xianghong Li / manager, Ms. Linying Yang / clerk and Ms. Chunxiu Ye / Worker representative participated in the opening & closing meeting. The opening meeting started at 8:30 and the closing meeting ended at 17:00. The auditor communicated the findings in detail to them and allowed them to ask questions and make any needed clarifications. Finally, they agreed on the findings and signed the on-site audit findings report.

### Remark:

1. The local legal minimum wage standard is CNY 2200 per month (or equivalent to CNY 12.64 per hour) before January 01, 2022 and CNY 2360 per month (or equivalent to CNY 13.56 per hour) since January 01, 2022.
2. No agency labour contract, government waiver or collective bargaining agreement was attached in the report for there was no agency, waiver or collective bargaining agreements in the factory.
3. The audit was conducted on November 9, 2022 by ALGI auditor Ms. Jouce Liang- APSCA registration No. CSCA 21701004.
4. The factory did not establish the procedure to calculate local basic living wage. So the auditor used the calculated basic living wage CNY 2813.45, which was calculated by the auditor through Anker's methodology. And all sampled workers' regular wages were more than the basic living wage.

## Site Details

Site : Shenzhen Comiso Digital Technology.,Ltd.

Site amfori ID : 156-042054-001

### GICS Classification

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Sector : Consumer Discretionary

Industry : Household Durables

Industry Group : Consumer Durables & Apparel

Sub Industry : Consumer Electronics

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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Manufacture of consumer electronics

### Water Stress Situation

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This site is not located in a water stressed region

## Metrics

### Key Metrics

Total workforce	48 Workers
Legal minimum wage in local currency	2360 Monthly
Lowest wage paid for regular work at the site	3818 Monthly
Calculated living wage in local currency	2813 Monthly
Total sample	7 Workers

### Other Metrics

Male workers	16 Workers
Female workers	32 Workers
Permanent workers - Male	16 Workers
Permanent workers - Female	32 Workers
Temporary workers - Male	0 Workers
Temporary workers - Female	0 Workers
Seasonal workers - Male	0 Workers
Seasonal workers - Female	0 Workers
Management - Male	2 Workers
Management - Female	2 Workers
Apprentices - Male	0 Workers
Apprentices - Female	0 Workers
Workers on probation - Male	0 Workers
Workers on probation - Female	0 Workers
Workers with night shift - Male	0 Workers
Workers with night shift - Female	0 Workers
Workers with disabilities - Male	0 Workers
Workers with disabilities - Female	0 Workers
Domestic migrant workers - Male	10 Workers
Domestic migrant workers - Female	21 Workers
Foreign migrant workers - Male	0 Workers
Foreign migrant workers - Female	0 Workers
Workers hired directly - Male	16 Workers
Workers hired directly - Female	32 Workers
Workers hired indirectly - Male	0 Workers
Workers hired indirectly - Female	0 Workers
Unionised workers - Male	0 Workers
Unionised workers - Female	0 Workers
Workers under CBA - Male	0 Workers
Workers under CBA - Female	0 Workers
Pregnant workers	0 Workers
Workers on parental leave - Male	0 Workers
Workers on parental leave - Female	0 Workers
Sample - Male	3 Workers
Sample - Female	4 Workers

## Findings

### PA1: Social Management System

The social management system was proved to be not that effective since some non-compliance issues were detected regarding Social management system, Workers Involvement and Protection, Decent Working Hours, Occupational Health and Safety and Ethic Business Behavior. Details please refer to Performance Areas 1, 2, 6, 7 and 13.

工厂的社会责任管理体系尚待完善，因为在此次审核中，发现了关于社会责任管理体系、工人参与和保护、体面劳动时间、职业健康与安全商业道德方面的问题。具体请参见区域1, 2, 6, 7和13。

Based on the management interview and workers interview, as well as attendance records and wage records for October 2022 (current month), June 2022 (random month) and March 2022 (random month). The workforce capacity in the factory was not assessed and properly planned to match delivery order contracts' expectations, as excessive overtime hours were detected in all sampled months. which exceeded legal overtime requirement. For details, please refer to 6.2. This violated the PRC Labor Law article 41.

根据管理层和员工访谈，以及2022年10月(当前月)，2022年6月(随机月)和2022年3月(随机月)的工资考勤和工资记录。工厂没有对现有员工产能是否可以按时完成客户订单数量进行有效评估和合理计划，以致于每一个抽样月份都发现有超时加班。超过法定加班要求。具体加班信息请参见6.2。这违反了《中华人民共和国劳动法》第41条。

### PA 2: Workers Involvement and Protection

Through on-site observation, documents review and interview, it was noted that the factory had posted the BSCI Code of Conduct in workshops, and provided training regarding BSCI Code of Conduct to all employees, through workers interview, all sampled employees could not clearly describe the detailed social compliance requirements. It was recommended that the factory should improve the training skill.

通过现场观察，文件审阅和员工访谈，得知工厂有张贴BSCI行为准则，且有提供有关BSCI行为准则的培训给员工，但是通过员工访谈，所有访谈员工均不清楚社会责任方面的内容和要求。建议工厂应提高培训技巧。

### PA 5: Fair Remuneration

Observation: The factory management had a good understanding about the concept of Living Wage, but the factory did not calculate the Living Wage. Remark: All sampled workers' regular wages were more than the basic living wage calculated by the auditor through Anker's methodology.

观察项：工厂管理者对于基本生活需求工资的概念有良好理解，但是没有计算基本生活需求工资。备注：所有抽样工人的正常工资均高于审核员通过 Anker 方法计算的基本生活工资。

### PA 6: Decent Working Hours

The overtime working hours exceeded the upper limit 36 hours per month. The monthly overtime hours of 7 out of 7 randomly selected employees ranged from 66-68 hours in October 2022(current month), 7 out of 7 had reached 74 hours in June 2022 (random month) and 7 out of 7 had reached 78 hours in March 2022 (random month). This violated the PRC Labor Law article 41.

工厂的月加班工时超过36小时。2022年10月(当前月)，7名被抽查员工的月加班工时均为66-68小时；2022年6月(随机月)，7名被抽查员工的月加班工时达到74小时；2022年3月(随机月)，7名被抽查员工的月加班工时达到78小时；这违反了《中华人民共和国劳动法》第41条。

### PA 7: Occupational Health and Safety

1, The factory had set up the occupational health and safety regulations and procedures; however, the actual practice throughout the factory was not full in compliance with requirements of local law in the parts of material storage. 2,20% finished goods in warehouse were being stored against wall. This violated the Rules Concerning Warehouse Safety and Fire Control article 18.

1, 工厂虽然建立了职业健康安全方面的程序和相关制度，但是工厂在实际的执行过程中还存在问题，例如材料存放方面。  
2, 工厂仓库内部分20%成品靠墙放置。这违反了《仓库防火安全管理规划》第18条。

Workers or worker representatives did not take part in health & safety risk assessment.

工厂进行健康安全风险评估时，员工和员工代表没有参与其中。

The factory did not post the accident procedures in workshops for workers and first-aid responder.

工厂没有在车间张贴紧急事故预案供相关员工和急救人员了解。

## PA 13: Ethical Business Behaviour

Noted that the factory did not establish procedure to collect, use and process personal information with reasonable care and in accordance with privacy and information security laws and regulatory requirements.

工厂没有建立程序以合理谨慎的方式，按照隐私和信息安全法和法规要求收集、使用和处理个人信息。