

Monitored Party <b>Zhejiang ERA Solar Technology Co., Ltd.</b>	amfori ID <b>156-025061-000</b>	Address <b>Sihai Road, Economic Development Zone, Huangyan ,, 318020 Taizhou, Zhejiang Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>APCER</b>
Monitoring Start Date <b>04/09/2023</b>	Closing Meeting Finished Date <b>06/09/2023</b>	Submission Date <b>15/09/2023</b>
Expiration Date <b>15/09/2024</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Zhejiang ERA Solar Technology Co., Ltd.</b>	Site amfori ID <b>156-025061-001</b>	

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## OVERALL RATING



## SECTION RATING

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

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

## GENERAL DESCRIPTION

Name of Lead auditor: Tink Ding; APSCA membership number: CSCA 21705532

Monitoring partner name: APCER (Monitoring firm APSCA #: 11600046)

Audit schedule details: The audit was planned for 1 auditor x 3 days.

Announcement Type: Semi-announced full audit.

Business partner information:

Zhejiang ERA Solar Technology Co., Ltd. (Local Name: 浙江公元新能源科技股份有限公司, Uniform Code of Social Credit: 913310037844231903) was located at Sihai Road, Economic Development Zone, Huangyan, Taizhou City, Zhejiang Province, China (中国浙江省黄岩经济开发区四海路). The factory was established on January 15, 2006 per business license review.

The factory is specialized in manufacturing of holiday lights, solar lights and solar modules.

Main production activities listed as below:

Holiday lights and solar lights workshop-Injecting, gluing, testing, assembling and packing

Solar modules workshop-Welding, laminating, framing, cleaning, testing and packing

No production process or service was subcontracted.

As per management interview, there was no obvious peak season in the factory.

Audited location information:

There were total 15 buildings (Including two 3-storey office buildings, three 1-storey production buildings, six 2-storey production buildings, two 4-storey production buildings, one 6-storey dormitory building and one 3-storey canteen buildings) in the compound, and all buildings were belonged to auditee. The auditee just used one 3-storey office building (1~3F-office), half of 1st and 2nd floor of one 2-storey production building (1F-solar modules workshop, 2F-warehouse), two 2-storey production buildings (1F-solar modules workshop, 2F-warehouse; 1F-injecting workshop, 2F-warehouse), two 1-storey production buildings (warehouse), two 4-storey productions (1F-warehouse, 2F and 4F-assembling and packing workshop, 3F-gluing workshop; 1~4F:warehouse), one 3-storey canteen building(1F-canteen, 2~3F-idle), 1st, 2nd, 3rd and 6th floor of one 6-storey dormitory building with a total construction area of 34900 square meters. The rest areas were rented by Zhejiang ERA Electrical Appliance Co., Ltd. as per rent contract, site tour and interview. The auditee shared buildings with this factory, and they were under the same group but with different management, HR system, payment system etc., and they did not share workers with each other. The auditee has arranged joint fire drill.

The factory did not provide transportation for employees.

Operating shifts and hours:

During the current audit, attendance records from August 1, 2022 to the audit date were provided for review. The regular working hours were listed as below:

Injecting workshop: 7:30 to 19:30 and 19:30 to 7:30 including 2 hours OT;

Security guards: 8:00 to 16:00, 16:00 to 0:00 and 0:00 to 8:00;

Solar modules: 8:00 to 20:00 and 20:00 to 8:00 including 2 hours OT;

Canteen staffs: 6:30 to 12:30 and 16:00 to 18:00;

Other employees: 7:30 to 11:30, 13:30 to 17:30 and 8:00 to 12:00, 13:00 to 17:00

Overtime working is arranged for 2 hours a day on weekdays and for 8 to 10 hours a day on Weekends if needed. Normal working days are from Monday to Friday.

Time recording system:

The factory used electrical attendance system to record employees' working hours including regular working hours and overtimes.

Salary payment details:

Payroll records from August 2022 to July 2023 were provided for review. Based on documents review and management interview, it was noted that all employees were paid by hourly rate. The factory normally paid employees on the 25th of the following month for the wage of the current calendar month via cash. The local legal minimum wage was RMB 2,070 per month equivalent to RMB 11.90 per hour since August 1, 2021. The factory paid employees at least RMB 16.09 per hour which was higher than local minimum wage requirement. For overtime premium, 150%, 200% and 300% of basic wages

were paid to employees for their overtime hours on weekdays, weekends and holidays respectively.

#### Worker number information:

On the audit day, there were total 496 employees (including 183 males and 313 females) in the factory, of which 383 employees (including 117 males and 266 females) were production workers. 305 employees were migrant people and all employees were hired by the factory directly. There was no vulnerable worker (such as pregnant, foreign migrant, young, disabled, temporary, seasonal, home-based worker) in the factory. The youngest employee was 18 years old and was born on January 8, 2005 and started working in the factory on January 10, 2023. No special group worker (such as interns, apprentices, contractor workers etc.) was found in this factory.

During this audit, 21 employees were interviewed, including 5 males and 16 females.

#### Good practices:

- a. The factory calculated the basic living wage (RMB 2200 per month) prior to the audit.
- b. The factory provided free dormitory and canteen to employees.

#### Worker organization details:

There was no union available in the factory, but there were six employees' representatives elected by employees on March 10, 2023.

#### Circumstances:

The management agreed auditor to visit the whole areas of the factory and kept an open attitude during the audit. During the onsite tour, no obvious gap identified between the workforce and production capacity, and all production processes were running normally. There was no special circumstance during the audit.

#### Summary of findings:

The factory management and employees (representative) showed a positive attitude to this audit during the whole process. The audit was basically fulfilled according to the audit plan sent prior to the audit. At the end of the audit, 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. The performance areas that needed improvements were as follows: PA 1-2, PA 5-7 and PA 12. No other serious issue was noted in this audit.

#### Living wage calculation:

- a. There is no GLWC benchmark for the audited location, so the data of Living Wage in the report were provided by the auditing company. Detailed data for Living Wage calculation were filled in the report.
- b. The factory had collected local data and calculated the Living Wage by using the table of Fair Remuneration Scan, which was RMB 2200/month. Relevant evidence was uploaded under Attachment. During this audit, the factory's data were accepted and used when PA5.4 was evaluated. The basic wages (Including post allowance and service award but not including overtime compensation) paid to all sampled workers in 3 sampled months ranged from RMB 2850 to 4200 per month, which were more than the local living wage RMB 2200 per month as calculated by the factory.

#### Personal data protection:

As Personal Information Protection Law was implemented in China since Nov 1, 2021, so employees' faces, names, ID numbers, contact information, brand names and logos etc. taken in the photos were protected in the sake of privacy.

#### Remark:

- a. There was no agency, contractor or collective bargaining agreement used by the auditee, which makes these documents not applicable. Also, no government waiver was obtained currently, which makes the waiver not applicable.
- b. The factory ever used the Chinese name “浙江公元太阳能科技有限公司” and “公元太阳能股份有限公司” per document review, interview and confirmed through Qichacha, and the EN name kept unchanged.
- c. There was another address named “No.888 Huangjiao Road, Economic Development Zone, Huangyan, Taizhou City” per site tour. The factory management explained the west gate was Sihai road, and the south gate was Huangjiao Road. Thus, the address registered on business license and this address were actually located at same site.

## SITE DETAILS

Site	Site amfori ID
<b>Zhejiang ERA Solar Technology Co., Ltd.</b>	<b>156-025061-001</b>

### GICS Classification

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Sector	Industry Group	Industry
<b>Consumer Discretionary</b>	<b>Consumer Durables &amp; Apparel</b>	<b>Household Durables</b>
Sub Industry		
<b>Consumer Electronics</b>		

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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N.A.

### Water Stress Situation

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N.A.

## METRICS

### Key Metrics

Total workforce	429	Workers
Legal minimum wage in local currency	2,070	Monthly
Lowest wage paid for regular work at the site	2,800	Monthly
Calculated living wage in local currency	4,784.91	Monthly
Total sample	21	Workers

### Other Metrics

Male workers	152	Workers
Female workers	277	Workers
Permanent workers - Male	183	Workers
Permanent workers - Female	313	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Management - Male	23	Workers
Management - Female	7	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	87	Workers
Workers with night shift - Female	91	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Domestic migrant workers - Male	111	Workers
Domestic migrant workers - Female	194	Workers
Foreign migrant workers - Male	0	Workers
Foreign migrant workers - Female	0	Workers
Workers hired directly - Male	183	Workers
Workers hired directly - Female	313	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	<b>0 Workers</b>
Workers on parental leave - Female	<b>0 Workers</b>
Sample - Male	<b>5 Workers</b>
Sample - Female	<b>16 Workers</b>

# FINDINGS



## PA1: Social Management System

Site: Zhejiang ERA Solar Technology Co., Ltd. | Site amfori ID: 156-025061-001

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>According to interviewing with management and employees as well as documents review, it was noted that factory had already established the social responsibility management manual and procedures based on amfori BSCI principles and local legal requirements. Relevant laws and regulations had been collected and updated by assigned person periodically. The factory management also conducted regular internal audits and provided related training for workers. However, the management system was not operated effectively as there were findings identified in PA2, PA5-7 and PA12, such as employees' monthly overtime exceeded legal limits systematically. This question is rated as partially because the general condition in the factory was acceptable and no serious issue was found.</p>	<p>通过与管理层和员工的访谈以及文件查看，审核发现工厂已经根据amfori BSCI原则和当地法律制定了社会责任管理手册和程序文件。相关法律法规已由专人定期收集和更新。工厂管理层还定期进行内部审计，并为员工提供相关培训。然而，管理系统并未有效运行，是因为在PA2，PA5-7和PA12中有发现点，如员工出现系统性月加班超时。这个问题被评为部分符合的原因是工厂的整体情况是可以接受的，没有发现严重问题。</p>

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>According to interviewing with management as well as documents review, it was noted that the factory had established the workforce planning and cost accounting procedures, while they did not conduct workforce capacity evaluation, which led to employees' monthly overtime exceeding legal limits systematically. This question is rated as partially because corresponding procedures has been established but not effectively implemented.</p>	<p>通过与管理层的访谈以及文件查看，审核发现工厂有建立产能规划和成本核算的程序，但没有进行产能评估，导致员工出现系统性月加班超时情况。这个问题被评为部分符合的原因是工厂已经建立相应程序，但并未有效的执行。</p>



## PA 2: Workers Involvement and Protection

Site: Zhejiang ERA Solar Technology Co., Ltd. | Site amfori ID: 156-025061-001



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

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

According to interviewing with management as well as documents review, it was noted that the factory has not defined long term goals to protect workers according to the amfori BSCI values and principles or its amfori BSCI performance. This question is rated as partially because the factory conducted internal and management audit annually to improve its social responsibility performance.

通过与管理层的访谈以及文件查看，审核发现工厂没有根据amfori BSCI价值和原则或其amfori BSCI表现去定义长期的目标去保护员工。这个问题被评为部分符合的原因是工厂会通过年度的内审和管理评审提升它的社会责任绩效。

**PA 5: Fair Remuneration**

Site: Zhejiang ERA Solar Technology Co., Ltd. | Site amfori ID: 156-025061-001

**Question:** 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

According to the social insurance receipt of July 2023, there were total 494 permanent employees at that time (including 7 retired employees, no newly hired, temporary or dispatched employee), 421 out of 487 eligible employees (86%) had participated in pension, unemployment, medical and maternity insurance, and 470 out of 487 eligible employees (97%) had participated in accident insurances. The factory provided commercial accident insurance to 197 employees including all employees who had not participated in social insurance with valid period from August 29, 2023 to August 28, 2024. The factory did not obtain any social insurance waiver. This violated the PRC Labor Law article 72 and 73. This question is rated as partially because the factory's social insurance participation ratio exceeded 80%. Remark: Per employees and management interview, they explained that participating in social insurance was voluntary and some employees were reluctant to participate in social insurance.

根据2023年7月份的社保缴费情况，工厂当时有494名员工（包含7名退休员工，无新进，临时或派遣员工），工厂有给487名有资格的员工中的421名（86%）提供了养老，失业，医疗，和生育险，给487名有资格的员工中的470名（97%）提供了工伤险。工厂给197名员工（包含所有未参加社保的员工）提供了商业意外险，有效期为2023年8月29日至2024年8月28号，工厂没有获得任何社保批文。这违反了《中华人民共和国劳动法》第72、73条。这个问题被评为部分符合的原因是工厂的社保参保比例超过了80%。备注：通过员工及管理层访谈，均表示参加社会保险是自愿的原则，部分员工不愿意参加社会保险。

**PA 6: Decent Working Hours**

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>The factory provided the attendance records of all employees from August 2022 to audit day for review. During this audit, the monthly overtime hours of 21 out of 21 randomly selected employees ranged from 40 to 78 hours in December 2022 (random month), 21 out of 21 randomly selected employees ranged from 40 to 88 hours in April 2023 (random month), 21 out of 21 randomly selected employees ranged from 40 to 92 hours in July 2023 (current month), which exceed the legal limitation of 36 hours per month. This violated the PRC Labor Law article 41.</p> <p>This question is rated as no because employees' monthly overtime exceeding legal limits systematically in the factory.</p>	<p>工厂提供了所有员工2022年8月至审核当天的考勤记录供查看。此次审核中，在2022年12月（随机月），随机抽样的21/21名员工的月加班工时为40至78小时，在2023年4月（随机月），随机抽样的21/21名员工的月加班工时为40至88小时，在2023年7月（当前月），随机抽样的21/21名员工的月加班工时为40至92小时，超过了法定要求的每月加班工时不超36小时的要求。这违反了《中华人民共和国劳动法》第41条。</p> <p>这个问题被评为不符合的原因是员工的月加班时间存在系统性超出法规要求的情况。</p>

## PA 7: Occupational Health and Safety

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>According to interviewing with management and employees, document review as well as site tour, it was noted that the factory had established a complete occupational health management system, but it did not operate effectively which resulted in the discovery of occupational health and safety issue in violation of laws in PA7.</p> <p>This question is rated as partially because the general condition of health and safety in the factory was acceptable and no serious issue was found.</p>	<p>通过与管理层和员工的访谈，文件查看以及现场走访，审核发现工厂已经建立了完整的职业健康管理体系统，但并未有效的运行，导致在PA7发现关于违反法定的职业健康安全问题的。</p> <p>这个问题被评为部分符合的原因是工厂健康安全的总体状况尚可接受，没有发现严重问题。</p>

**Question: 7.3** Is there satisfactory evidence that the auditee regularly carries out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH	LOCAL LANGUAGE
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Finding	
<p>According to interviewing with management, document review as well as site tour, it was noted that the factory provided pre-service and in-service occupational health checks to employees (e.g. welding and injecting) in workshop who were in contact with hazardous substances. However, the occupational health checks were not provided to employees before they leave the posts. This violated the PRC Law of Prevention and Control of Occupational Diseases Article 35.</p> <p>This question is rated as partially because the factory has established health and safety procedures and conducted testing of factors of occupational hazards regularly.</p>	<p>通过与管理层的访谈，文件查看以及现场走访，审核发现厂方有为车间接触有毒有害物质的员工(如焊接和注塑)提供岗前和在岗的职业病体检，但工厂并没有组织这些员工在离岗时进行职业病体检。这违反了《中华人民共和国职业病防治法》第三十五条。</p> <p>这个问题被评为部分符合的原因是工厂有制定健康安全程序文件，并对车间进行定期的职业危害因素检测。</p>

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>According to interviewing with management and employees as well as site tour, it was noted that welding employees and cleaning employees using alcohol in solar modules workshop did not wear protective masks provided by factory. This violated the Law of the PRC on Work Safety Article 42.</p> <p>This question is rated as partially because the factory has conducted risk assessment of positions, and they also provided suitable PPE and regular training to employees.</p>	<p>通过与管理层和员工的访谈以及现场走访，审核发现太阳能组件车间的焊工和使用酒精的清洗员工未佩戴工厂提供的防护口罩。这违反了《中华人民共和国安全生产法》第 42 条。</p> <p>这个问题被评为部分符合的原因是工厂有进行岗位的风险评估，工厂有提供合适的劳保用品和定期的培训给员工。</p>

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>According to interviewing with management and employees, document review as well as site tour, it was noted that no anti-leakage facilities/secondary containers was available for soldering fluxes used in welding workshop for solar modules and two buckets of glue stored at 1st floor of one 4-storey warehouse building. This violated the Regulations on the Safety Management of Dangerous</p>	<p>通过与管理层和员工的访谈，文件查看以及现场走访，太阳能组件的焊接车间使用的助焊剂和一栋四层仓库一楼存储的两桶胶水未设置防渗漏设施/二次容器。这违反了《危险化学品安全管理条例》第二十条。</p> <p>这个问题被评为部分符合的原因是化学品安全技术说明书有张贴在化学品仓库以及相关的车间；所有的相关人员有培训如何使用化学品。</p>

Finding	
Chemicals Article 20. This question is rated as partially because MSDS were posted in the chemical warehouse and related workshops; All related employees were trained how to use chemicals.	

**Question:** 7.9 Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?

ENGLISH	LOCAL LANGUAGE
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Finding	
<p>According to interviewing with management and employees as well as site tour, it was noted that 10% of electrical boxes were not posted with warning sign in workshop and dormitory; no safety warning posted at the elevator area in the factory, such as no elevator in case of a fire. This violated the Law of the PRC on Work Safety Article 32. This question is rated as partially because the factory has established the electrical safety management procedures and provided regular training for employees; The factory has identified occupational hazards in workshops and trained employees.</p>	<p>通过与管理层和员工的访谈以及现场走访，审核发现车间和宿舍10%的电箱没有张贴警示标识；工厂电梯处没有张贴安全提醒，如火灾禁止乘坐电梯。这违反了《中华人民共和国安全生产法》第32条。这个问题被评为部分符合的原因是工厂有建立电气安全管理程序，并为员工提供定期的培训；工厂识别了车间的职业危害，且向员工进行了培训。</p>

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

ENGLISH	LOCAL LANGUAGE
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Finding	
<p>According to interviewing with management and employees, document review as well as site tour, it was noted that 3 out of 3 randomly selected electrical boxes were lack of inner insulation cover and unlocked in the dormitory. This violated the General Guide for Safety of Electric User GBT 13869-2017 Article 5.1.2. This question is rated as partially because the factory has established the electrical safety management procedures and provided regular training for employees. Moreover, electrical boxes were installed with external insulation covers and inspected by qualified electrician monthly.</p>	<p>通过与管理层和员工的访谈，文件查看以及现场走访，审核发现宿舍3/3个抽样电箱缺少内绝缘保护罩且未上锁。这违反了《用电安全导则》GBT 13869-2017 第5.1.2条。这个问题被评为部分符合的原因是工厂有建立电气安全管理程序，并为员工提供定期的培训，此外电箱均安装了外绝缘保护罩，并由有资质的电工进行月检。</p>



## PA 12: Protection of the Environment

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

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

According to interviewing with management, document review as well as site tour, it was noted that the factory did not yet monitor its noise emitted from production process regularly. This violated the Measures for the Administration of Environmental Surveillance Article 21.

This question is rated as partially because there was no obvious noise pollution. The factory has established an external complaint mechanism and they has not received any complaints.

通过与管理层的访谈，文件查看以及现场走访，审核发现工厂没有对其产生的厂界噪声进行定期监测。这违反了《环境监测管理办法》第21条。这个问题被评为部分符合的原因是工厂没有明显的噪声污染，同时工厂已建立了外部投诉机制且未收到过任何投诉。