

		CODE OF CO	ONDUCT AUDIT SUMMARY		
Dayler San			Built loss	Audit Date	
Citizan bada	400			September 5,	2017
Facility Name			Facility Contact	Time In Tin	ne Out
SuZhou DuoLaiYur	n Housware Co. ltd.		Mr. Lining	9:00am	3:00pm
Facility Address/Telephone				Country	
No 13 Zhenbei Roa	d Xi Zhang Feng Hı	uang Suzhou Jiangsu/ 86-512-82	2568290	China	
Product Category			Audit Team		
Non-Foods			J. Shen/ L. Liu/ C. Zhang	_	
Factory Address in (Chinese (if applicable	s)		Report #:	
		(镇北路)13号(苏州多来运家原	居用品有限公司)	201707-COC-(05237-1A
# of Production Employees Present Day of Audit	# of Management Interviewed	Number of Employees Interviewed	Number of Production Employees on Payroll (Sample or Most Recent Month)		cords Reviewed
		Direct: 10		Direct	10
43	2	Contracted: 0	42	Contracted	0
Region Minimum Wage	Average Regular Hours	Average Overtime Hours	Average Regular Wages	Average Overtime Wage	
RMB 1940 per month since July 163.2 hours in 1, 2017 July 2017 57.8 hours in July 2017			RMB 2203.2 in July 2017	RMB 1429.7	in July 2017
Does the facility ha	ave a high/low prod	luction season?	NO	Previous Audit Date	
If yes, what month	s are high (peak) s	eason?	N/A		nuit Date
Assessment Type		☑ Initial Audit	\square Re-Audit \square Annual Audit	N/A	
Score Rating					vious Rating
0.4			able With Concerns		/A
Red (100+) Critical		Red (100+) Critical			111
		UD Unable to Determine			
			Score Breakdown		
1. Child Labor / Age D	ocuments	0	6. Age Documents, Labor Contracts, Right to Work Documents20		
2. Compulsory Labor .		0	7. Disciplinary Practices0		
3. Abuse & Harassme	nt	0	8. Health and Safety44		
4. Wages and Benefits	3	20	9. Environmental Issues0		



Working	Houre	10	10. Other Laws and Employment Standards	0
J. WOLKING	110015	10	10. Other Laws and Employment Standards	.0



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A. Code Element	B. Matrix Code	D. Finding Description	E. Local Law	F. Recommended Corrective Action	G. Suggested Time Frame
Age Documents, Labor Contracts, Right of Work Documents	F.3.1	The facility did not maintain the age documents of four temporary workers detected in inspection section. As per onsite observation and interview, their ages are all above 18 years old.	PRC Regulations Banning Child Labor (2002), Article 4	The facility was advised to properly preserve all employees' age documents.	30 days
Wages and Benefits	D.3.9	Coverage of social insurance is insufficient. The facility provided five kinds of social insurance to 22out of 44 employees (excluding 9 retired employees) in July 2017. In addition, the facility provided commercial injury insurance to 24 employees.	PRC Labor Act (1995), Article 72&73	The facility should provide five kinds of social insurance to all the employees.	30 days
Working Hours	E.3.1	Monthly overtime exceeds 36 hours for all sampled 10 employees in May, June and July 2017. The maximum monthly overtime is 50 hours in May 2017, 52 hours in June 2017 and 60 hours in July 2017 respectively.	PRC Labor Act (1995), Article 41	Monthly overtime should not exceed 36 hours per month.	30 days
Health and Safety	H.2.2	One evacuation path near the cutting section is partially blocked by materials. The facility moved the materials out on the assessment day.	PRC Fire Protection Law (1998) Amendment (2009), Article 28	The facility was advised to ensure that all the evacuation paths are not blocked.	1 day
Health and Safety	H.2.4	Three viewed over-lock machines in sewing section are missing eye guards.		The facility was advised to equip the over-lock machines with eye protection covers in sewing section.	30 days
Health and Safety	H.2.9	The electrical switches in 2 out of 10 sampled control panels are not labeled with functions.	Client Code of Conduct	The facility was advised to label all the electrical switches of control panels with functions.	30 days
Health and Safety	H.2.13	Basics supplies such as toilet paper and soap are missing in toilets.	Client Code of Conduct	The facility was advised to provide basic supplies such as toilet paper and soap in toilets.	30 days
Health and Safety	H.2.14	Employees who contact hazardous gas in glue preparation section are wearing one-time-use mask instead of provided respirator.	PRC Production Safety Law, Article 42	The facility was advised to govern and educate employees to wear proper PPEs.	30 days



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Health and Safety	H.3.19	The accommodation area is not	PRC Fire Protection Law (1998)	The facility was advised to that employees'	60 days		
nealth and Salety	п.5.19				ou days		
		separated from flammable materials	Amendment (2009), Article 19	accommodation areas shall be separated from			
		storage area. Staff accommodation is		production areas and warehouses.			
		detected in a room of one flat					
		auxiliary building. The rooms beside					
		are used as inventory warehouse and					
		toilets. The flat auxiliary building is					
		around 100 square meters and the					
		accommodation room is around 10					
		square meters.					
	•						
Above and Beyon	ıd						
None							
A signature on this	Audit Summary Repor	t signifies your agreement and unders	tanding of the above findings a	nd the Facility Action Plan.			
Accepted By (Signat	ure)	on fi	le	Auditor (Signature): on file			
Printed Name/Title		Mr. Lining/ Adr	min Director	Auditor: J. Shen/ L. Liu/ C. Zheng			
Date Signed:		September	5, 2017	5-Sep-17			
			<u> </u>				
Audit results review	ed with Management		Yes	No (Explain):			
Audit results agreed	with and corrective		✓				
action plan signed			Yes	No (Explain):			
Facility Managemen	Facility Management Comments: (No paraphrasing, Provide exact wording)						
None							

CHILD LABOR

Child labor:	□Yes	⊠ No	□ N/A	Minimum Working age:	16 years restriction	s old with ons	
Youngest age at facility:	20 years	old		Below National age:	□Yes	⊠ No	UD
Lacking valid age documents:	∐Ye	s [⊠ No	What (%) of the workforce lacks age documents?	N/A		
EMPL	OYEE	DOCUM	IENTAT	ION / LABOR CONTRACT	S		
Juvenile Health Exam Certificates on file:	□Yes	☐ No	⊠ N/A	Juvenile Registration on file:	□Yes	☐ No	⊠ N/A
What (%) of workforce under 18 years of age but above legal working age? 0%							
What (%) of above lack legally re	equired ju	venile em	iployee do	cuments?	N/A		
Does the facility have an appren	ticeship p	rogram fo	or students	s or others?	□Yes	⊠ No	□ N/A
How many students or other app	rentices a	are currer	ntly emplo	yed?	0		
What (%) of employees lack lega	ally requir	ed emplo	yment cor	ntracts?	0%		
Narrative Section:							
Currently, there are total 53 permanent employees and 4 temporary employees (including 47 production employees and 10 non-production employees) in the facility, with no juvenile working in the facility. The youngest employee is 20 years old. During the walkthrough, the auditor selected 10 employees, especially young looking ones, from various positions for private interview. No child labor was detected. Age documents of all interviewed employees were required to provide for review. However, the facility did not maintain the age documents of the 4 temporary workers detected in inspection section. As per onsite observation and interview, their ages are all above 18 years old. This is in violation of PRC Regulations Banning Child Labor (2002), Article 4. The facility was advised to properly preserve all employees' age documents. The labor contracts of all interviewed employees were also provided for review. The items listed on labor contracts are sufficient and proper. As reported, the employees were provided with copies of labor contracts. There is no apparent concern regarding this section.							
FORCED LABOR / HUMAN TRAFFICKING							
Compulsory daily quota:	□Yes		⊠ No	Documents withheld:	☐Ye:	s	⊠ No
Mandatory overtime:	□Yes		⊠ No	Lock In/Out:	☐Ye:		⊠ No
Employees allowed to leave after their shift:	⊠Yes		□ No	If yes, for how many employees:	N/A	•	
Deposit Upon Hire:	□Yes		⊠ No	Amount of deposit	N/A		
	FO	REIGN	OR MIG	RANT WORKERS			
Terms of employment provided in written and in the worker's language?							

Original documentation retained (i.e. passport)

Is the recruiting fee paid up front in home province/country?

No

No

Yes

Yes

N/A

Is the recruiting fee deducted from the workers' wages?	□Yes	☐ No	⊠ N/A
Narrative Section:			
The auditors observed that all employees are Chinese. No prison labor was detected during the interviewed employees, they worked for this facility on their own will. The overtime working voluntary basis. No withheld of any personal files were reported.			-
All the interviewees also reported that they have unrestricted access to toilets and drinking was and are free to leave the facility during non-working hours.	iter durinç	y working	hours,
There is no apparent concern regarding this section.			

ABUSE / HARASSMENT				
Where did the abuse/harassment take place	N/A			
When did the abuse/harassment take place	N/A			
Why did the abuse/harassment occur	N/A			
What happened during the abuse/harassment	N/A			
How many employees reported the abuse/harassment	N/A			
Narrative Section:				
Currently, no any kind of abuse was reported or observed. All interviewed employees reported that they are treated				
respectfully by the facility management.				
There is no apparent concern regarding this section.				

WAGES / BENEFITS / HOURS INFORMATION					
Currency:	RMB	Region Minimum Wage:	since July RMB 1820) per month 1, 2017;) from January June 30, 2017	
US Exchange Rate:	USD 1 = RMB 6.6768	Overtime Premium:	and 300% for regula	an 150%, 200% of regular rate r, rest day and noliday overtime pectively	
Standard Work Week: 8 hours per day and 40 hours per week					
Does the facility provide other subsidies or benefits to the workers, such as meals, uniforms, housing, maternity leave, paid leave, etc.?					
If yes, in what form, how often, and for how long? Does it comply with National Law? Annual paid leave which comply with national law					
Narrative Section:					

Currently, a full audit of payroll journals and time records was conducted. One year's payroll journals and time records from August 2016 to July 2017 were required and provided for review. As per the facility management, there is no obvious peak or non-peak season in the past year. Therefore, the payroll journals and time records from May 2017 to July 2017 were selected as primary samples.

The payroll journals are itemized with employee name and department, hourly wage, total working hours, regular overtime hours, rest day overtime hours, national holiday overtime hours, overtime wage, deductions of tax and social insurance, actual total wage, employee's signature and payment time and so on. As per the facility management and document review, employees in the facility are paid at 15th of each month for the last natural month in cash. No delay payment was detected. Employees sign on the payroll journals for verification. And pay slips are provided to employees in each month.

All the sampled employees are paid in hourly rate. The local minimum wage is RMB 1940 per month/ RMB 11.15 per hour since July 1, 2017 and RMB 1820/ RMB 10.46 per hour from January 1, 2016 to June 30, 2017. In the sampled months, employees in the facility are paid at least RMB 13.0 per hour, which is more than the local minimum wage. As per the provided time records, employees conducted regular day overtime and rest day overtime in sampled months. And 150% and 200% of normal hourly wage are sufficiently paid to employees for the regular day overtime and rest day overtime.

The resignation application forms, payment records and time records of resigned employees were required to provide for review. The resigned employees in the facility were legally paid.

The social insurance receipts of recent three months were required to provide for review. <u>However, coverage of social insurance is insufficient.</u> The facility provided five kinds of social insurance to 22 out of 44 employees (excluding 9 retired employees) in July 2017. In addition, the facility provided commercial injury insurance to 24 employees. This is in violation of PRC Labor Act (1995), Article 72&73. The facility was advised to provide five kinds of social insurance to all the employees.

All sampled employees work in one shift from 8:00am to 5:00pm with one hour lunch break from 11:30am to 12:30pm. Regular overtime working hours would be conducted from 6:00 pm to 8:00 pm, 1 to four times per week. Rest day overtime working hours would be conducted on Saturdays, 4 to 5 times per month. As per the facility management, they uses swiping IC cards system to keep the time records for employees. According to the provided time records, all sampled employees swiping IC cards 4 times per working day with additional twice for regular overtime. One day rest per week is provided to them.

However, monthly overtime exceeds 36 hours for all sampled 10 employees in May, June and July 2017. The maximum monthly overtime is 50 hours in May 2017, 52 hours in June 2017 and 60 hours in July 2017 respectively. This is in violation of PRC Labor Act (1995), Article 41. The facility was advised that monthly overtime should not exceed 36 hours per month.

DISCIPLINARY PRACTICES / DISCRIMINATION / FREEDOM OF ASSOCIATION

Narrative Section:



Currently, the facility regulations and payroll registers do not show any disciplinary deductions. No practice of disciplinary deduction was detected. All interviewed employees stated that they are treated equally and no discrimination regarding age, gender or other personal characteristics was reported in the facility. Freedom of association is guaranteed.

There is no apparent concern regarding this section.

HEALTH & SAFETY
Narrative Section:



Currently, auditors conducted a thorough health and safety walkthrough in the facility. The audited facility rented the third floor of one 5-storey building and a flat building from the landlord Zhangjiagang Beishun Rubber Products Co., Ltd. The third floor of 5-storey building serves as the management office. The flat building is used as the adhesive section, cutting section, sewing section, inspection section and packing section, where all the production processes are included. In addition, the audited facility utilize one room in one flat auxiliary building near the main production building as inventory warehouse.

However, the accommodation area is not separated from flammable materials storage area. Staff accommodation is detected in a room of the flat auxiliary building. The building is owned by the landlord but the audited facility utilizes one room in the building as inventory warehouse. The flat auxiliary building is around 100 square meters and the accommodation room is around 10 square meters. There is another room used as toilet in the flat auxiliary building. As per the facility management and onsite observation, the person who uses the accommodation room is not the audited facility's employee. This is in violation of PRC Fire Protection Law (1998) Amendment (2009), Article 19. The facility was advised to that employees' accommodation areas shall be separated from production areas and warehouses.

Emergency exits are sufficiently provided with exit signs and emergency lights on each floor. No emergency exit is locked or blocked. Evacuation plot plans and evacuation directional signs are available.

However, one evacuation path near the cutting section is partially blocked by materials. The facility moved the materials out on the audit day. This is in violation of PRC Fire Protection Law (1998) Amendment (2009), Article 28. The facility was advised to ensure that all the evacuation paths are not blocked.

Fire extinguishers are sufficiently provided on each floor. All fire extinguishers are properly mounted. No fire extinguisher is blocked. Fire alarm and button are provided in the assessed facility. As per the provided records and photos, the facility conducted the fire and emergency evacuation drill twice in the past 12 months, which all employees were engaged in.

All wires in the facility are covered. There are certificated electricians working in the facility responsible for the electrical safety. The electrical control panels are provided with outer and inner covers.

<u>However, the electrical switches in 2 out of 10 sampled control panels are not labeled with functions.</u> The facility was advised to label all the electrical switches of control panels with functions.

There is no special equipment such as forklift is used in the facility. The facility mainly uses sewing machines, over-lock machines and cutting machines during production process. <u>However, three viewed over-lock machines in sewing section are missing eye guards.</u> This is in violation of General Safety and Hygiene Rules for Designing Production Equipment (GB5083-1999), Article 6.1.6. The facility was advised to equip the over-lock machines with eye protection covers in sewing section.

The facility provided PPE such as metal gloves and masks to employees. <u>However, employees who contact hazardous gas in glue preparation section are wearing one-time-use mask instead of provided respirator. This is in violation of PRC Work Safety Law (2002), Amendment (2014), Article 42. The facility was advised to govern and educate employees to wear proper PPEs.</u>

The facility has qualified first aid staff. First aid kits are available and adequate on the workshop. All employees could drink clean water during operating time as observed. The gender segregated toilets are sufficiently provided. However,

<u>basics</u> supplies such as toilet paper and soap are missing in toilets. The facility was advised to provide basic supplies such as toilet paper and soap in toilets.

ENVIRONMENTAL

Narrative Section:

Currently, there is no waste water, noise or polluted gas generated from production. The facility basically did not use any chemical.

There is no apparent concern regarding this section.

LEGAL ISSUES / LICENSES (Subcontracting)

Narrative Section:

Currently, the valid business license and the national tax and local tax registration were provided to review. As per the facility management, all the process could be finished in the facility and no subcontracting facility was used. During the walkthrough, it was noted that there are sufficient manpower and machines to finish all the process. There is no apparent concern regarding this section.

DORMITORIES

Narrative Section:

N/A. Currently, as per facility management and employee interview, no dormitory is provided to employees in the facility.

SECURITY

Narrative Section:

Currently, the facility is entirely enclosed by fencing and the entrance to the facility is properly gated and guarded. Security guards are patrolling the facility 24 hours a day and 7 days a week.

However, upon arrival, auditors were not checked for entry permisson or not escorted on the way from the facility gate to the office room. The facility was advised to implement a procedure to check visitors for entry permission and escort them while on facility premises.

In addition, auditors were not required to provide proof of identity or not not required to sign on visitor's log while entering the facility. The facility was advised to require visitors to provide proof of identity and keep visitor record logs.

The facility have a written security procedure plan, conduct routine security awareness training and education for all employees. <u>However, the facility did not maintain the age documents of four temporary employees.</u> The facility was advised to maintain age documents for all employees.

All employees are required to wear identification badges. <u>However, around 50% employees' badges were missing</u> photos. The facility was advised to attach photos in all employees' badges.

<u>Besides</u>, no background checks was conducted for employees. The facility was advised to conduct pre-employment screening on prospective employees, as well as periodic background checks once employed.

As per facility management, all containers were checked and identified prior to entry and the records regarding container paperwork and seals were maintained. The facility established the container-loading control procedure, which includes that all containers are loaded on facility site in a special loading area, all cargo area are secured to prevent unauthorized access and facility properly stores empty and full containers on site to prevent unauthorized access. The facility utilizes its own checklist to conduct inspection for empty containers.

CONCLUSION

Narrative Section:

The initial audit was conducted at SuZhou DuoLaiYun Housware Co. ltd. on September 5, 2017. After exchanging business cards and communicating the visit purpose, the auditors held an opening meeting with the presence of Mr. Lining/ Admin Director and the management team. During the opening meeting, auditors explained the audit procedures. Then, a full audit was permitted to include document review, private employee interview and health and safety walkthrough. The facility management appeared cooperative and receptive during the audit. Mr. Lining/ Admin Director signed on the Statement of Integrity.

At the end of the initial audit, a closing meeting was held with Mr. Lining/ Admin Director and the management team. Concerns were explained to the facility representative in detail, along with the corresponding corrective action plans. The facility management appeared to be receptive to the recommendations and agreed to correct the current findings. Mr. Lining/ Admin Director signed on the Corrective Action Plan. Based on the current findings, the facility was graded as "Needs Improvement (94)" for future sourcing.

PAYROLL REVIEW					
Payroll/Time records were reviewed for the following months	From May 2017 to July 2017	,			
Total employees on payroll (Most Recent Month)	52				
Total employees on payroll (Previous Month)	52				
Employees in Sample	10				
Average Regular Wages (Most Recent month)	RMB 2203.2 in July 2017				
Average Overtime Wages (Most Recent month)	RMB 1429.7 in July 2017				
Average Total Wages (Most Recent month)	RMB 3632.9 in July 2017				
Equivalent in US Currency	\$ 544.11				
Regular Hourly Work Paid At The Government Minimum Wage	⊠ YES	□ NO			
Total Pay At Least Correct Minimum Wage	⊠ YES	□ NO			
Overtime Paid	⊠ YES	□ NO			
Payroll records maintained for appropriate amount of time:	⊠ YES	□ NO			
Payroll records appear to accurately display all working hours	⊠ YES	□ NO			
Social insurance/holiday benefits provided in accordance with law	☐ YES	⊠ NO			
Piece rate production conducted:	☐ YES	⊠ NO			
Average Piece Rate Wages earned for Normal Hours:	N/A				
Average Piece Rate Wages earned for Overtime Hours	N/A				
Piece rate production recorded on:	N/A				
Number of Piece Rate Employees N/A					
WORKING HOURS I	REVIEW				
Average Regular hours (Most Recent month)	163.2 hours in July 2017				
Average Overtime Hours (Most Recent month)	57.8 hours in July 2017				
Average Total Hours (Most Recent month)	221 hours in July 2017				
Total of most hours worked by an employee (Most Recent month)	228 hours in July 2017				
Average Regular hours (Previous month)	176 hours in June 2017				
Average Overtime Hours (Previous month)	52 hours in June 2017				
Average Total Hours (Previous month)	228 hours in June 2017				
Total of most hours worked by an employee (Previous month)	228 hours in June 2017				
Time Records Display All Overtime Hours	⊠ YES	□ NO			
Overtime Hours Verified to be Voluntary	⊠ YES	□ NO			
Time Records Display Weekend Working Hours	⊠ YES	□ NO			
Overtime Hours Approved by Local Government	☐ YES	⊠ NO			
Overtime Waiver Validity Period	N/A				
What months' time records were reviewed to assess the OT waiver?	N/A				
Number of Regular Hours allowed by waiver	N/A				
Number of Overtime Hours allowed by waiver	N/A				
Total hours worked so far during Waiver Period:	N/A				

FACILITY OWNERSHIP					
Length of Supplier/Facility Relationship 2 years Years at same location 3 years					
Supplier Production At Facility					

WORKFORCE / PRODUCTION CAPACITY							
Current Low Season Peak Season							
# of permanent employees	53	N/A	N/A				
# of temporary employees 4 N/A N/A							
Production Capacity	200,000 pieces	N/A	N/A				

		FACILITY		Specialty: Carpet				
Products Produced:		Carpet						
Production Processes:		adhesive -cutting-sewing-inspecting-packing						
MACHINERY								
Total:	64	Types:	Glue-preparing machines: 4; sewing machines : 43; Cutting machines:7; Others: 10					
Manufacturers/Retailers with Work In Process and labels viewed (approx. %)		1.Walmart:35%		2.JCP:25%	3.Kroger: 15%			
		4.Others: 25%		5.Label viewed onsite: bebe:50%; Everyday Living:50%	6.			

	⊠ N/A				
Process & Key F	Parts Produced	N/A			
Facility Name	N/A		Facility specialty	N/A	
Address/ Telephone	N/A		# of client's pieces subcontracted/month	N/A	
Notes	N/A			"	
Process & Key F	Parts Produced	N/A			
Facility Name	N/A		Facility specialty	N/A	
Address/ Telephone	N/A		# of client's pieces subcontracted/ month	N/A	
Notes	N/A				



Action Plan

- 1. An Action Plan must be submitted in **English** to the Costco supplier **within 5 days** of the audit date. Costco supplier is required to upload it into BPM.
- 2. List the violations in the same order as they are listed on the "Concerns on Above" section
- 3. Next to each violation, indicate a <u>Proposed Correction or Remediation as well as an exact target</u> <u>date for completion</u>. Some violations must be corrected in full within 7 days, and others within 30 -60 days, depending upon the specific violations.
- 4. You must specify actual completion dates (refer to the example below), and do not use imprecise words such as "immediate," "within 30 days," etc. A revised Action Plan may be required.

EXAMPLE								
Supplier Name	Facility Name	Date of Audit	Date of Action Plan					
Sample Supplier Inc.	Sample Facility Ltd.	1/1/2016	1/3/2016					
Violation Observed	Target Date For Completion							
Minimum wage not guaranteed	All employees will be compens regional minimum wage for all	1/20/2016						
Overtime incorrectly compensated	All overtime hours will be comp 150%, 200% or 300% of the no wages respectively.	1/20/2016						
Facility lacking employee age documentation for 15% of the employees	Photocopies of the employee's will be made and included in all files,	1/5/2016						
Fire Extinguishers not mounted	All extinguishers on the floor w wall	ill be mounted on the	1/8/2016					