

**MONITORING ID: 26-0382219**

Monitored Party <b>Zhangzhou Gerui Metal Manufacturing Co., Ltd.</b>	amfori ID <b>156-068641-000</b>	Address <b>No.27,Longxiang Rd.,Taiwanese Investment Zone,Jiaomei Town, Zhangzhou, Fujian Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Small Producer Assessment</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>Bureau Veritas Hong Kong Limited</b>
Monitoring Start Date <b>17/03/2026</b>	Closing Meeting Finished Date <b>17/03/2026</b>	Submission Date <b>24/03/2026</b>
Expiration Date <b>24/03/2027</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Zhangzhou Gerui Metal Manufacturing Co., Ltd.</b>	Site amfori ID <b>156-068641-001</b>	

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## OVERALL RATING



## SECTION RATING

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

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, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	D	
PA 13: Ethical Business Behaviour	A	

## GENERAL DESCRIPTION

Name of lead auditor: Charles Lin; APSCA membership number: CSCA 21702572

Name of team auditor (if applicable): Nil

Name of observers, translators, trainees, advisors/consultants (if applicable): Nil

Monitoring partner name: Bureau Veritas Consumer Products Service

Audit Company APSCA Number: 11600002

Audit schedule details: The audit is planned for 1 auditor x 0.5 day on site.

Business partner information: The factory was established on September 24, 2024 and specialized in the manufacture of Solar bracket. Business license number was 91350681MAE0D86B3L, Factory name in English was Zhangzhou Gerui Metal Manufacturing Co., Ltd. Factory local name was 漳州格锐金属制造有限公司. Factory address on business license was 福建省漳州台商投资区龙祥路27号2号车间. Factory address of in English was No.27,Longxiang Rd.,Taiwanese Investment Zone,Jiaomei Town, Zhangzhou, China.

The main production processes including cutting, punching, welding, machining, assembling, inspection and packing.

Audited location information: Based on onsite observation and management interview, the factory rented one flat production building for warehouse, production and office. The auditee did not provide canteen, transportation or dormitory to workers. No relationship with other factories located within the same production boundary.

Operating shifts and hours:

The normal working day was from Monday to Friday. The auditee arranged the overtime on Saturday and rest day on Sunday. There was only one shift from 08:00 to 17:00 with a break from 12:00 to 13:00 for employees.

Time recording system: The factory adopted facial scan system to record employees' working hours.

Salary payment details: Employees' wages were paid within 15 days of the following month. Employees' wages were paid by cash. Per payroll review and interviews with management and employees, all employees were paid by hourly rate.

Worker number information: There were a total of 5 employees with 4 production workers (3 males and 1 female) and 1 non-production staffs (0 males and 1 female) in the factory. The youngest employee noted during this audit was 38 years old. There were 2 domestic migrant workers (1 male and 1 female) in the factory but no other vulnerable worker such as the young, pregnant and etc. Further, there was also no special group workers such as interns, apprentices, contractor workers in the factory.

Good practices: 15 minutes break was provided for every two working hours.

Worker organization details: There was no union in this factory. The factory respected the rights of workers to elect the workers' representatives. 1 workers' representative was elected by all workers in October 2025.

Circumstances: There was no special circumstance during the audit.

Summary of findings: It was noted that the gap was noted in the sections of Social management system (PA 1.1), Workers Involvement and Protection (PA 2.2), Fair Remuneration (PA 5.2 and PA 5.3), Decent Working Hours (PA 6.2), Occupational Health and Safety (PA 7.1 and PA 7.6), Protection of the Environment (PA 12.1 and PA 12.2).

Living wage calculation: The Basic Need Wage was provided by Auditing Company, please refer to the Report Attachments.

BV has used the methodology which is similar with Anker Benchmark methodology to estimate the living wage by estimating the cost of a basic but decent lifestyle for a worker and his/her family. This involves adding up the cost of three expenditure groups: food (for a low-cost nutritious diet), housing (for basic healthy housing), and other essential expenses for a family, and then adding a small margin for sustainability and emergencies. The reason BV does not use Anker benchmark is no data in GLWC for area where the factory is located. The data source: onsite audit information collection (BV BNW)

Remark:

There are no contractor/agencies/government waivers/collective bargaining used or available by the auditee, which makes the contractor license/agency labour contract/government waivers/collective bargaining agreements not applicable.

This audit was a Small Producer Assessment (SPA). Through document review and management interviews, the following key information regarding the producer's structure and validation methods was confirmed:

Producer structure: The factory is a small-scale enterprise with an annual turnover below 2 million EUR (approximately 1.49 million EUR). Since its establishment, it has maintained a stable workforce of 5 permanent employees, with no seasonal or temporary workers employed.

Validation method: The assessment of compliance with SPA criteria was conducted via document review (including financial statements and employee rosters) and management interviews, supplemented by self-declaration validation from the factory management to confirm the accuracy of operational and employment data.

## SITE DETAILS

Site  
**Zhangzhou Gerui Metal  
Manufacturing Co., Ltd.**

Site amfori ID  
**156-068641-001**

### 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  
**Housewares & Specialties**

### 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 sample	5	Workers
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## Other Metrics

Total workforce	5	Workers
Male workers	3	Workers
Female workers	2	Workers
Non-binary workers	0	Workers
Permanent workers - Male	3	Workers
Permanent workers - Female	2	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	0	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	1	Workers
Domestic migrant workers - Female	1	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers
Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Unionised workers - Male	0	Workers

Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Legal minimum wage in local currency	2,045	Monthly
Lowest wage paid for regular work at the site	3,000	Monthly
Calculated living wage in local currency	2,213.87	Monthly
Sample - Male	3	Workers
Sample - Female	2	Workers
Sample - Non-binary	0	Workers

## FINDINGS

### PA1: Social Management System

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**Question:** 1.1 Is there satisfactory evidence that the auditee has understood the importance to implement the amfori BSCI Code of Conduct in its small business?

#### ENGLISH

#### LOCAL LANGUAGE

#### Finding

Based on management and employee interview, factory tour and document review, it was noted that the auditee had set up a management system to implement the BSCI Code of Conduct. The executives and management staffs were aware of the legal rights and duties under labor legislation. The facility conducted BSCI internal audit and management review regularly. However, the social management system was not implemented effectively, and gaps were detected in Performance Area 1, 2, 5, 6, 7, 12 during this audit. No findings were raised under other performance Areas. Therefore, this finding was rated as partially. In accordance with BSCI 1.1.

经管理人员及员工面谈、现场巡查及文件审阅，审核员发现被审核方建立了执行BSCI行为守则的管理体系。管理层员工了解劳工权益和劳动法规要求。工厂定期开展了BSCI内审和管理评审，但管理体系执行不够有效，此次审核中，在执行领域1、2、5、6、7、12发现了差距。审核员未在其他执行领域发现问题点。因此，这个问题被判定为部分不符合。根据BSCI 1.1条款。

### PA 2: Workers Involvement and Protection

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**Question:** 2.2 Is there satisfactory evidence that the auditee has an effective channel to address any workers complaint?

#### ENGLISH

#### LOCAL LANGUAGE

#### Finding

Based on interviews and document review the factory had established grievance mechanism, but the factory didn't conduct satisfaction survey on the grievance procedure. Thereof auditor concluded it as partial non-compliance. In accordance with Performance Area 2: Workers Involvement and Protection 2.2. Factory management agreed with the issue and would take corrective action as soon as possible.

通过访谈和文件审核，审核员发现工厂已经建立了申诉机制，但是工厂没有对申诉机制进行满意度调查。综上所述，此问题点判为部分不符合。根据执行领域工人参与和保护2.2改善。工厂同意该问题并表示尽快改善。

### PA 5: Fair Remuneration

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**Question:** 5.2 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

Based on document review, management and worker interviews, it was noted that the audited factory did not know the basic living wage and did not calculate the basic living wage. The basic living wage was provided by the audit company. This finding is rated as N. This violated BSCI 5.2.

基于文件查阅、管理层访谈和工人访谈，评估发现工厂不了解当地生活工资，亦没有计算当地的生活工资。基本生活工资的相关数据由审核公司提供。这个问题判定为不符合。根据BSCI 5.2要求改善。

**Question:** 5.3 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

Based on management and worker interviews and the social insurance payment receipt provided by factory management, there were 5 employees with no retired employees. It was noted that 1 out of 5 employees (20%) were provided with injury insurance, unemployment insurance, pension insurance, medical insurance and maternity insurance in March 2026. All the employees in this factory were permanent workers and no temporary workers were employed in this factory. The policy on the legal benefits for the workers which including the social insurance was established. The factory management declared that that they could not provide social insurance to all employees currently but they would increase the proportion of participation in social insurance. The question was rated as No because the factory did not provide social insurance to all employees. Remark: the factory provided the commercial accident insurance to all employees with the valid period from October 16, 2025 to October 15, 2026. Therefore, all employees were provided with accident insurance or commercial accident insurance. In accordance with Article 73 of the Labor Law of the People's Republic of China.

根据管理层和员工访谈以及厂方提供的2026年3月社会保险缴费单据，显示工厂有5名员工，没有退休员工。为1/5名(20%)员工购买了工伤保险，失业保险，养老保险，医疗保险和生育保险。工厂所有工人都是固定工人，没有临时工。关于员工享受的法定福利包括社会保险的政策有建立。管理层解释目前无法为所有员工购买社保，但是会逐步增加社保参保比例。因为工厂没有为所有员工购买社保，此问题点判为不符合。备注：工厂为所有员工提供了商业保险，有效期从2025年10月16日到2026年10月15日。因此所有的员工都被提供了工伤保险或者商业工伤保险。根据《中华人民共和国劳动法》第73条改善。

**PA 6: Decent Working Hours**

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**Question:** 6.2 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>Based on management and worker interviews and time records review it was identified that it was noted that 10 out of 15 sampled employees worked in excess of the statutory overtime hour limits. A review of 15 sampled employees' time records (5 samples from November 2025, 5 samples from January 2026 and 5 samples from the most recent paid month February 2026) yielded the following: 5 out of 5 sampled employees worked in excess of 36 overtime hours per month (i.e.40-72 hours) in November 2025, which was not in compliance with the legal requirement. 5 out of 5 sampled employees worked in excess of 36 overtime hours per month (i.e. 40-70 hours) in January 2026, which was not in compliance with the legal requirement. This question is rated as "No" because the factory has established the working hours management policies and procedures according to the Amfori BSCI CoC and local Law. The factory management was clear that the monthly overtime hours of employees should not exceed 36 hours, but the factory did not establish contingency plans in case of production slowdown or disruption based on capacity planning and order arrangement, resulting in overtime hours of employees, which did not fully comply with the requirements of the Amfori BSCI Code of conduct. This violated Article 41 of the Labor Law of the PRC.</p>	<p>基于厂方提供的工时记录和管理层和员工访谈，审核员发现员工加班时间超出了法定标准。审核员从厂方提供的工时记录中抽取15个样本(其中从2025年11月抽取5个，从2026年1月抽取5个和从最近月份2026年2月抽取5个)，发现共有10名员工加班时间超出了法定标准，具体为：5/5名员工在2025年11月的加班时间为40-72小时，超过每月加班时间不能超过36小时的法律规定。5/5名员工在2026年1月的加班时间为40-70小时，超过每月加班时间不能超过36小时的法律规定。此问题判为完全不符合的原因在于工厂虽结合Amfori BSCI行为守则和相关法律法规制定了工时管理制度，明确员工的月加班时间不得超过36小时规定，但是工厂没有结合产能规划和订单安排建立应对减缓或干扰生产时的应急计划，导致员工加班时间超时。这没有遵循Amfori BSCI行为准则的要求。根据《中华人民共和国劳动法》第41条改善。</p>

## PA 7: Occupational Health and Safety

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**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>Based on interviews, factory tour and document review it was noted that the factory did not provide the occupational health checks to employees in cutting section and punching section who were in</p>	<p>通过访谈，现场走访和文件审核，审核员发现厂方没有为在下料车间和冲压车间接触噪声的员工提供职业病体检。工厂应给接触有毒有害物质的员工提供职业病体检。综上所述，此问题点判为完全不符</p>

Finding	
contact with noise. The factory shall ensure that occupational health checks were provided to all employees handling hazardous materials. Thereof auditor concluded it as non-compliance. In accordance with Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases. Factory management agreed with the issue and would take corrective action as soon as possible.	合。 根据《中华人民共和国职业病防治法》第35条。工厂同意该问题并表示尽快改善。

**Question:** 7.6 Is there satisfactory evidence that the auditee implements control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below limits that can harm workers health or lives?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on interviews and factory tour it was noted that there was no anti-leakage facility (e.g. secondary container) for all cutting Emulsifier was being used in the spray-painting section. The factory had posted complete MSDS onsite, conducted risk assessments for hazardous chemicals, but did not provide occupational health examination for relevant employees, no secondary container might cause the operators being unable to promptly obtain the risk warning information for the chemicals, thereby leading to the neglect of potential safety hazards during the operation process. Thereof auditor concluded it as noncompliance. In accordance with article 20 of Regulation for Safety of Hazardous Chemical. Factory management agreed with the issue and would take corrective action as soon as possible.	通过访谈和现场走访，审核员发现工厂喷漆车间使用的切割乳化剂均没有配备二次容器。工厂现场有张贴完整的MSDS，进行了危险化学品的风险评估，但是没有提供职业病体检给相关的员工，没有二次容器可能导致操作人员无法及时获取化学品的风险警示信息，进而忽视操作过程中的安全隐患。综上所述，此问题点判为完全不符合。 根据《危险化学品安全管理条例》第20条。工厂同意该问题并表示尽快改善。

## PA 12: Protection of the Environment

Site: Zhangzhou Gerui Metal Manufacturing Co., Ltd. | Site amfori ID: 156-068641-001

**Question:** 12.1 Is there satisfactory evidence of the auditee's required environmental permits and licences?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on interviews, factory tour and document	通过访谈，现场走访和文件审核，审核员工厂未能

Finding	
<p>review it was noted that factory management was unable to provide the fixed pollution source registration documents for review. Therefore auditor concluded it as non-compliance. This violated Regulations on the Administration of Pollutant Discharge Permits, Article 24. Factory management agreed with the issue and would take corrective action as soon as possible.</p>	<p>提供固定污染源登记文件。综上所述，此问题点判为 完全不符合。 根据排污许可管理条例第24 条 工厂同意该问题并表示尽快改善。</p>

**Question:** 12.2 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	
<p>Based on factory tour and document review it was noted that the factory provided the contact to prove the Waste Cutting Fluid (HW09) was disposed by Xiamen Dongjiang Environmental Protection Co., Ltd to. And the contractor had the valid contractor's hazardous waste operation license. However, the factory management was unable to provide the hazardous waste transfer manifest for review. Thereof auditor concluded it as partial noncompliance.</p> <p>In accordance with article 6 of the Measures for Administration of Hazardous Waste Transfer Manifest Factory management agreed with the issue and would take corrective action as soon as possible.</p>	<p>通过现场走访和文件审核，审核员发现工厂提供了合同证明废切削液(HW09)交给厦门东江环保有限公司处置，该处理商具有有效的危废经营许可证。但工厂不能提供这些危废的转移联单。综上所述，此问题点判为部分不符合。 根据《危险废物转移联单管理办法》第六条</p>