

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS1000073990	Site name	INSPIROR BAG (CAMBODIA) MANUFACTURING CO LTD
Business name	INSPIROR BAG (CAMBODIA) MANUFACTURING CO LTD.	Site address	080105 Prey Chamkar Village, Lumhach Commune Ang Snoul District, Kandal Province Cambodia, Prey Chamkar Village, KH

Audit details

Sedex company reference	ZC5000062345	Auditor company name	BUREAU VERITAS CPS - ASIA
Audit company address	Lot C7-C9, Conurbation 2, Cat Lai Industrial Zone, Dist. 2, HCM city, Vietnam, Ho Chi Minh, VN, 08		
Date of audit	2025-07-22	Audit conducted by	Stanley Yang
Audit pillars	Labour Standards Health and safety		
Time in and out	Day 1		Day 2
	In	09:45	In 08:30
	Out	16:00	Out 15:00
Audit type	Full initial		
Was the audit announced?	Semi announced		

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Was the Sedex SAQ available for review? No

Who signed and agreed CAPR? Mr. Tang Porke / HR

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	Ms. Angel Su / Manager, Mr. Tang Porke / HR and Mr. Torn Vuthy / Worker Representative. There's no union in the factory.		
Reason for absence during the audit	Ms. Angel Su / Manager, Mr. Tang Porke / HR and Mr. Torn Vuthy / Worker Representative. There's no union in the factory.		
Reason for absence at the closing meeting	Ms. Angel Su / Manager, Mr. Tang Porke / HR and Mr. Torn Vuthy / Worker Representative. There's no union in the factory.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

1. This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

2. The semi-announce window of this audit is from July 14, 2025 to August 8, 2025.

Lead auditor

Stanley Yang

APSCA Number

21702342

Additional auditor

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Auditor team

Date of declaration 2025-07-23

Site representation

Declaration I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.

Full name Mr. Tang Porke

Title HR

Date of declaration 2025-07-23

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601034095
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601034096

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	i	i
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

[← Summary of findings](#)

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ℹ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000062345	
Sedex site reference	ZS1000073990	
Company name	INSPIROR BAG (CAMBODIA) MANUFACTURING CO LTD.	
Business ownership type	GOODS	
Site name	INSPIROR BAG (CAMBODIA) MANUFACTURING CO LTD	
Site name in local language		
GPS location	GPS address	PREY CHAMKAR VILLAGE, LUMHACH COMMUNE ANG SNOUL DISTRICT KANDAL PROVINCE, KANDAL, null, CAMBODIA
	Coordinates	Latitude: 11°48'44" N Longitude: 104°66'50" E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Angel Su
	Job title	Manager
	Phone number	86-13950051631
	Email	sales8@picnic-bag.com
Applicable business and other legally required business license numbers and documents	1. Business License number 1000316546 2. Tax ID number: L001-902304166	

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of made-up textile articles, except apparel
	Secondary	
	Other	
Product type	Bags	
Process overview	The factory was specialized in the manufacture of bags. The main production activities in the factory included cutting, sewing, lasting, inspection and packing. Production line: 1 The main equipment was cutting machines, sewing machines, punching machines, etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	2974m ²

[← Management systems](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	sewing, inspection and packing
Building 2	Last construction works on site	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	cutting
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No	
Does the site organise worker transport to the worksite?	Not provided	
	There' no legal requirement that the site must provide transport for workers.	

[← Site details](#)

[Worker analysis →](#)

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other certification, Other social audit
GRS and WRAP

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No
No, the site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
No Human Rights Impact Assessment (HRIA) was ever conducted in the site.

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	115 (49.1%)	119 (50.9%)	- -	234 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	115 (49.1%)	119 (50.9%)	- -	234 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Where workers have migrated internally, N/A
list the most common internal states
workers have moved from

Workers by age

	Men	Women	Other	Total
18 - 24 years old	115 (49.1%)	119 (50.9%)	- -	234 (100%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods N/A. There was no obvious peak season in the facility.

Please list the nationalities of all workers, with the three most common nationalities listed first Cambodian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Cambodian	49%	51%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	115 (49.1%)	119 (50.9%)	- -	234 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	115 (49.1%)	119 (50.9%)	- -	234 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details N/A

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (100%)	0 (0%)	- -	1
Supervisors or team leaders	4 (80%)	1 (20%)	- -	5
Administrative staff	0 (0%)	1 (100%)	- -	1

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 4 groups of 5

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

[← Worker analysis](#)

[Measuring workplace impact →](#)

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

What was the general attitude of the workers towards their workplace?

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

NA. All workers interviewed had a positive attitude to management and site. No complaint was raised.

What did the workers like the most about working at this site?

Equal opportunities
Facilities (e.g. rest area, recreation, canteen)
Freedom of movement
Grievance mechanisms
Hours worked, rest days or breaks
Job security
Training and development

Additional comments

26 workers were randomly selected from different departments for private interview. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory, and they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect.

They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their worker representative who would take it to the worker management committee.

They got paid on time and the factory treated them with respect and dignity. Working environment was comfortable.

Most workers enjoyed working at this factory, they felt they had sufficient work and had a good relationship with management in general.

Attitude of workers

Attitude of workers' committee/union representatives

Worker representatives showed positive attitude towards auditor during interview process and meeting. The worker committee reps were satisfied with the working conditions, and they stated that they could give suggestions on all parts of the site's practices. Worker representative was aware about the responsibility, and he understood that he is the bridge between management and workers.

Attitude of managers

At the opening meeting, auditor explained the audit scope and the audit standard to the factory representative.
Factory tour, document review, interviews with management members and workers were conducted as scheduled in the audit programs. A full audit was finished under the co-operation of the factory representatives.
The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had implemented a Health & Safety committee to take care of health and safety concerns.

Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	10	10	-	20
Workers interviewed individually	3	3	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.5%	-	2.5%
Last full calendar year (2024)	1.0%	1.0%	-	2.0%
Previous full calendar year (2023)	-	-	-	-

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	1.0%	1.0%	-	2.0%
Previous full calendar year (2023)	-	-	-	-

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded? No

No accident happened in the past 12 months. Accident would be recorded if occurred.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	-	-	-	-

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	-	-	-	-

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%

[← Worker interviews](#)

[Code area 0 →](#)

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	-	-	-	-
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Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	-	-	-	-

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	Current system		
	Factory allowed full access for Management interview, document review, factory tour and employees' interview. Accurate information was verified by factory profile information gathering. No bribes or threaten to auditor were note. A human rights policy statement was approved by senior management. Sufficient training for all employees was conducted periodically.		
	Evidence examined – to support system description		
	Document review (i.e. social compliance general policies, payroll records, time records, social security fund, health and safety certificates, training records etc.)		
	Factory tour		
	Worker interview		
	Management interview		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
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Did any workers selected by the auditor decline to be interviewed?	No
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1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established a policy and procedures prohibiting forced labor. The admin& HR manager was appointed to take charge of responsible employment. Training on employment policy and forced labor was provided for the workers once they entered the factory and periodically. Regular monitoring was conducted to implement the related policies. Based on site verification (including on site observation, document review, management and workers interview), no negative evidence was found on this section.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 0](#)

[Code area 1.A →](#)

Systems and evidence examined to validate this code section

Current system

Based on documents review, management and employee private interviews, no forced, bonded or involuntary prison labor was noted, and all sampled employees were not required to lodge “deposits” or their identity cards and were free to leave or resign after reasonable notice. The factory did not detain any original documents such as ID Cards or Educational Certificates etc. The factory only kept the copies of these documents.

Based on site verification, no negative evidence was found on forced labor.

Evidence examined – to support system description

Document review (Policy documents, anti-force labor policies, training records, factory rules, personnel files, resignation records, employee handbook etc.)

Worker interviews

Onsite observation

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on recruitment and entitlement to work. The HR & admin manager was appointed to take charge of recruitment and entitlement to work. Training on recruitment and entitlement to work was provided for the workers once they entered the factory and periodically. Based on site verification (including onsite observation, document review, management and workers interview), no agency staff or foreign worker was used by the factory. All workers had the proper legal rights to work in this region. Monitoring actions like internal audit, management interview was done regularly to monitor the recruitment and entitlement to work.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 1](#)

[Code area 2 →](#)

Systems and evidence examined to validate this code section

Current system

The factory established a policy and procedure on recruitment and entitlement to work. Factory had directly employed all the workers in production workshop. Based on site verification, no agency staff or foreign worker was used by the factory. All the workers in the factory were Cambodian. All workers had the proper legal rights (worker permission) to work in this region.

Evidence examined – to support system description

Document review (recruitment policies, labor contracts, name list etc.)

Employees interview

Onsite observation

Management interview

[← Code area 1](#)

[Code area 2 →](#)

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes? Workers are recruited, selected, and hired directly by our company

How do the labour providers recruit and hire workers? N/A - Recruitment providers not used

Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey? 0

Are there any subcontracted workers (excluding dispatched labour) on site? No

Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview? Not Applicable

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site? No

[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No
No any recruitment fees.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on freedom of association. The HR & admin manager was appointed to take charge of Freedom of association. Training on recruitment was provided for the workers once they entered the factory and periodically. Based on site verification (including on site observation, document review, management and workers interview), there was no union in the factory and two worker representatives (Cambodian) elected by workers freely in the factory. Workers could raise their grievances or complaints to their management or worker representatives or top management directly, also through a suggestion box. Monitoring actions like internal audit, management interview was done regularly to monitor freedom of association.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 1.A](#)

[Code area 3 →](#)

No findings

**Systems and evidence examined to
validate this code section**

Current system

There was a worker committee in the factory. Suggestion box was used for employees to put forward any idea. According to workers interview, they were free to join organizations of their own choice, the factory management recognized and respected their rights to freedom of association and collective bargaining, and the workers were not subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization. No worker union was established in the factory yet. There were two worker representatives (Cambodian) selected by employees freely in 2025.

Evidence examined – to support system description

Document review (Freedom of association policy, worker committee records etc.)

Employees interview

Management interview

Factory tour

[← Code area 1.A](#)

[Code area 3 →](#)

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The factory established a policy and procedure on health and safety and appointed responsible person to take charge of health and safety. General health and safety condition in the factory were good (i.e. Sufficient fire-fighting equipment were installed in the factory with proper maintenance. Ventilation, temperature and lighting were adequate for the production processes. Sufficient clean toilets segregated by gender were always available to workers. Potable water was freely available in all areas etc.). Factory provided training on health and safety to employees, such as: PPE usage, machinery safety, fire safety was provided for the workers when they entered the factory and periodically. Monitoring actions like internal audit, management interview was done regularly to monitor workplace safety. However, non-compliance issues about some employees were not properly use PPE and machine guard. Since the issues occurred due to monitoring actions are systemically incomplete and training about health and safety was not fully implemented, the auditor raised them as fundamental improvements recommended in training and communication and monitoring actions.

Summary of findings

[← Code area 2](#)

[Code area 4 →](#)

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601034095
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601034096
Systems and evidence examined to validate this code section	Current system Based on site verification, the ventilation, temperature and lighting in the factory were adequate for the production processes. The factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers. Sufficient drinkable water, toilet and first aid kits were available in workshops. Legal construction safety document was provided for review. Workers receive regular and recorded health & safety training. Fire drills were planned to be conducted twice per year including firefighting exercise and evacuation exercise, evacuation exercise etc. The special equipment operator certificate and special equipment registrations were provided by the audited factory. Evidence examined – to support system description Document review (fire drill records, emergency evacuation plan, training records and certificates, fire equipment maintenance records, trained first aiders register, accident reports, potable water testing certificates etc.). The legal required document (e.g. The building structural was inspected/evaluated (called close construction permit) by the Ministry of Land Management, Qualification Effectiveness of The Prevention and the Fire Fighter System and Certificate of Training on Prevention Firefighting and Rescue) were provided to auditor for review. Factory tour Worker interview Management interview		

Findings: non-compliances

ZAF601034095

Non-compliance

Due 2025-08-29

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Time given to resolve

30 days

Issue title

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

It was noted that 1/1 cutting employee were not wearing the dust-proof masks provided by the audited factory during the working hour.

审核员发现工厂1/1名削皮员工在工作时没有佩戴由工厂配发的防尘口罩。

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that necessary personal protective equipment are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately.

建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。

Local law reference

In accordance with Cambodia Law, Prakas 230: All establishments and work places must be set up to guarantee the safety of workers. Machinery, mechanisms, transmission apparatus, tools, equipment and machines must be installed and maintained in the best possible safety conditions. Management of technical work utilizing tools, equipment, machines, or products used must be organized properly for guaranteeing the safety of workers.

根据柬埔寨劳动法，通告230: 工作场所必须设立保障工人安全的设施。机械、机构、传动装置、工具、设备和机器必须在最佳安全条件下安装和维护。必须妥善对使用工具、设备、机器或产品的技术工作进行安排和管理，以确保工人的安全。

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[cutting employee did not wear provided dust-proof mask.JPG](#)

* PDF generated at 06:43 (UTC) on 30 Jul 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601034096		Non-compliance	Due 2025-08-29
Code area		Status	
3 Working conditions are safe and hygienic		Open*	
Workplace requirement		Time given to resolve	
3.M Ensure all machinery is installed, maintained, and used in a safe manner.		30 days	
Issue title		Verification method	
264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)		Desktop audit	
Description		Area of non-compliance/non-conformance	
It was noted that 1/2 hot-drying machines in the sewing workshop were not equipped with shield. 审核发现工厂针车车间1/2个烘线机没有安装防热装置。		Local law	
Corrective and preventative actions			
It is recommended that management adopt practices and controls to ensure that all machines have protective device. 建议工厂为所有机械安装隔热装置。			

Local law reference

According to Law on Administration of Factory and Handicraft (2006), dated 23 June 2006, Chapter III, Industrial Safety, Article 27: Machineries and part of machineries, which may eventually cause accident, shall have covers or protecting equipment. Area of factory, which may cause serious accidents, shall be surrounded by fence.

根据柬埔寨工厂和手工行政法规（2006），第27条，对会造成工伤伤害的机械应当配备保护装置。

Evidence



[hot-drying machine without shield.JPG](#)



* PDF generated at 06:43 (UTC) on 30 Jul 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable The factory construction was got the permits. There were not any structural additions.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on child labor and young workers. The HR & admin manager was appointed to take charge of child labor and young workers. Training on child labor and young workers was provided for the workers once they entered the factory and periodically. Based on site verification (including on site observation, document review, management and workers interview), the workers must present their original ID card to proof their ages while recruiting, once workers have joined their ID copies were kept in their personnel file and there was no child labor under the age of 15 years old in the factory. Checks of all workers' files showed that the youngest worker present was 18 years old in the factory. No child labor or young worker was identified during the audit. Monitoring actions like internal audit, management interview was done regularly to monitor child labor and young workers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 3](#)

[Code area 5 →](#)

No findings

**Systems and evidence examined to
validate this code section**

Current system

Based on the review of the personnel files and employee interview, all sampled employees were above the age of 18 years old when hired by the factory. The factory established a policy that they would never employ and use any child labor under the age of 15 years old. The factory would verify all workers' original ID cards and worker permission at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. Each employee file included a recent photo and the age documentation, which was in the form of photocopied national identification card. The card listed the employee's name, household address and the date of birth. The youngest worker in the facility was 18 years old.

Evidence examined – to support system description

Document review (ID copy and personnel files, worker permission, factory policy, latest list of employees, factory tour, employees interview).

Factory tour

Worker interview

[← Code area 3](#)

[Code area 5 →](#)

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	100%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on workers' wages and benefits. The admin & HR manager was appointed to take charge of workers' wages and benefits. Per payroll records, all employees were properly paid with basic wage and overtime wage. Training on workers wage and benefits was provided for the workers once they entered the factory and periodically. Monitoring actions like internal audit, management interview was done regularly to monitor workers' wages and benefits. All employees participated in social security fund program. Monitoring actions like internal audit, management interview was done regularly to monitor wages and benefits.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Current system

The factory established a policy and procedure on workers' wages and benefits. The admin & HR manager was appointed to take charge of workers' wages and benefits. Training on workers wage and benefits was provided for the workers once they entered the factory and periodically. During the audit, the auditor reviewed the payroll and attendance records of 26 samples from auditor selected month September 2024, 26 samples from auditor selected month December 2024 and 26 samples from the most recent paid month June 2025. The auditee respected workers right of getting fair remuneration partially. All employees were guaranteed with minimum wage. All employees were paid timely. No disciplinary deduction was made. Production workers were paid at an hourly rate in cash twice per month. The first payment time was dated on 25th of the current month. The second payment time was dated on 10th of the following month. Remark: The first payment was paid on 25th of the month with total USD 100-150, and the second payment was paid on 10th of the following month with a whole monthly earning including basic wage, bonuses and allowances (minus the first payment amount USD 100-150), which was compliance with local legal requirement. The minimum wage paid to employees was USD 204 (December 2024) and USD 206 (January 2025) per month during the probation period and USD 208 for normal working hours after probation period, which was in compliance with local minimum wage of USD 204 per month for normal working hours during probation period in 2024 and USD 206 per month for normal working hours during probation period in 2025, and USD 208 for normal working hours after probation since January 1, 2025. All sampled employees obtained at least one day off every seven consecutive days. All employees were provided social security fund. The factory arranged some employees OT within the period mentioned in the OT permission and paid 150% of their normal wage for the overtime working hours on the normal working days.

Evidence examined – to support system description

Document review (wage and benefits policies, payment records, time records, social security fund, training records, production records etc).

Worker interview

Management interview

Factory tour

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Wages were paid in cash.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Other (provide details) All employees were provided with social security fund.
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Not available	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	2.0
	Max hours per week	10.0
	Max hours per month	Non applicable
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	208.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	208.0
Minimum legal overtime wage	Min per hour	1.5
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

Actual minimum overtime wage	Actual per hour	1.5
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 samples from September 2024 26 samples from December 2024 26 samples from June 2025 (most recent payment month)
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes Local minimum wage of USD 204 per month for normal working hours during probation period in 2024 and USD 206 per month for normal working hours during probation period in 2025, and USD 208 for normal working hours after probation since January 1, 2025.
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	0% workforce earning under minimum wage 90% of workforce earning minimum wage 10% of workforce earning above minimum wage
Are there any bonus schemes used?	Yes Full attendance bonus (USD 10), Housing and transportation allowance (USD 7), Social security, Meal bonus for OT (USD 4.5)
Were accurate records shown at the first request?	Yes

[← Code area 5](#)

[Code area 5.A →](#)

Were any inconsistencies found? No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	Current system The breakdown of the wage of all the employees in the factory included regular wage, overtime wage, holiday wage, position allowance full attendance allowance etc. The living wage consideration in the factory meets ILO's principles for living wage estimation. All necessary elements were included. And there is an annual review mechanism. Evidence examined – to support system description Document review (wage and benefits policies, payment records, time records, social security fund, training records, BNW investigation form and production records etc.). Worker interview Management interview Factory tour		

[← Code area 5](#)

[Code area 6 →](#)

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure regarding working hours. The HR & admin manager was appointed to take charge of working hours. Training on working hours was provided for the workers once they entered the factory and periodically. The regular working hours and OT hours were in compliance with the requirement of local law. Monitoring actions like internal audit, management interview was done regularly to monitor workers' working hours.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 5.A](#)

[Code area 7 →](#)

Systems and evidence examined to validate this code section

Current system

The factory established a policy and procedure regarding working hours. The admin& HR manager was appointed to take charge of working hours. Training on working hours was provided for the workers once they entered the factory and periodically. Based on site verification, the factory adopted biometrics system to record workers' working time. Biometric time record system was used for recording working hour. Production employees ran 1 shift from 7:00 to 16:00 with the lunch break from 11:00 to 12:00 from Monday to Saturday (normal working hours: 8 hours/ day and 48 hours /week). They always had a rest on Sunday and statutory holidays. During the audit, the auditor reviewed the attendance records of 26 samples from auditor selected month September 2024, 26 samples from auditor selected month December 2024, 26 samples from the most recent paid month June 2025. It was noted that the longest consecutive working days were 6 days. The maximum overtime hours per day were 2 hours and the maximum total working hours per week were 58 hours. According to the payroll and time records, no OT was found on the statutory holiday.

Evidence examined – to support system description

Document review (working hours policies, time records, training records, production records, overtime permit issued by local government etc.).

Worker interview

Management interview

Factory tour

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	No overtime premium was less than 125%. 150% of regular wage was paid for overtime working on weekdays. No overtime work was noted on holidays.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	58.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	58.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on discrimination. The HR & admin manager was appointed to take charge of anti-discrimination. Training on antidiscrimination was provided for the workers once they entered the factory and periodically. Based on site verification (including on site observation, document review, management and workers interview), there was no negative evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found. And the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background etc.; female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill. Monitoring actions like internal audit, management interview was done regularly to monitor the subject of non-discrimination practices.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 6](#)

[Code area 8 →](#)

No findings

Systems and evidence examined to validate this code section

Current system

According to document review, workers interview and factory tour, there was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, material status, sexual orientation, union membership or political affiliation. Female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill. The supervisor and management treated the Cambodian worker friendly and nicely.

Evidence examined – to support system description

Document review (non-discrimination policies, factory rules, training records, grievances records etc).

Worker interview

Management interview

Factory tour

[← Code area 6](#)

[Code area 8 →](#)

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 4%

Representation of women in managerial roles (ratio of women workers to women managers) 0%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 0%

Three most common nationalities in managerial and supervisory roles Cambodian and Chinese

[← Code area 7](#)

[Code area 8 →](#)

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on recruitment. The admin & HR manager was appointed to take charge of recruitment. Training on recruitment was provided for the workers once they entered the factory and periodically. Based on site verification (including onsite observation, document review, management and workers' interview), all the employees were recruited by the factory directly. No labor agency was used to hire workers. No apprenticeship schemes or home workers were identified either. The factory signed labor contracts with all employees within one month when they joined the factory. Monitoring actions like internal audit, management interview was done regularly to monitor regular recruitment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 7](#)

[Code area 8.A →](#)

**Systems and evidence examined to
validate this code section**

Current system

The factory signed labor contracts with all workers to establish the employment relationship and confirm the rights and obligations of the employment conditions. All the employees were recruited by the factory directly. No labor agency was used to hire workers. No apprenticeship schemes or home workers were identified either. The factory signed labor contracts with all employees within one month when they joined the factory.

Evidence examined – to support system description

Document review (recruitment policies, name list, factory rules, employees' files, labor contracts etc).

Worker interview

Management interview

Factory tour

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on sub-contracting and homeworkers. The general manager was appointed to take charge of sub-contracting and homeworkers. Training on sub-contracting and homeworkers monitoring knowledge was provided for related management and workers once they entered the factory and periodically. Based onsite verification (including onsite observation, document review, management and workers interview), no subcontractor and homeworking were used by the factory. Monitoring actions like internal audit, management interview was done regularly to monitor subcontracting and homeworkers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 8](#)

[Code area 9 →](#)

Systems and evidence examined to validate this code section

Current system

Per factory tour, it was noted that the production processes in the factory were complete, and this was also verified through production processes overview provided by factory. Auditor also checked material in-and-out records; no subcontracting was noted. Management confirmed that they would not use any subcontractor unless agreed by their client. Per factory tour, employee interview and document review, it was also noted that all productions were onsite, no homeworking was noted.

Evidence examined – to support system description

Document review (subcontracting policies, supplier selection policy, supplier assessment records, production records etc).

Worker interview

Management interview

Factory tour

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
There was mechanism in place for monitoring the subcontract units for agreement with laws or the code, no homeworkers was noted in the suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
As per the workers' capacity and production records, no concerns about unrecorded work or undeclared sub-contracting on site.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used? No

[← Code area 8.A](#)

[Code area 9 →](#)

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on harsh or inhumane treatment. The HR & Admin manager was appointed to take charge of harsh or inhumane treatment. Training on harsh or inhumane treatment was provided for the workers once they entered the factory and periodically. Based onsite verification (including onsite observation, document review, management and workers interview), there was no negative evidence of harsh or inhumane treatment was found. And there was an internal process for grievance, which is an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination etc.). Any received complaint will be handled by management, without any reprisal for the worker in question. Monitoring actions like internal audit, management interview was done regularly to monitor harsh or inhumane treatment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 8.A](#)

[Code area 10.A →](#)

No findings

Systems and evidence examined to validate this code section

Current system

The factory established a policy and procedure on harsh or inhumane treatment. The policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited strictly. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory and the disciplinary procedure of the factory is verbal warning and education. And there was an internal process for grievance, which is an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.

Evidence examined – to support system description

Document review (anti-harassment policies, factory rules, training records, grievance records etc.).

Worker interview

Management interview

Factory tour

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	According to employees' interview, they represented that the factory had set suggestion box and provided hot line for them to reporting any violations of labour standards and H&S.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

[← Code area 9](#)

[Code area 10.A →](#)

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on the environment. The general manager was appointed to take charge of the environment. Training on the environment was provided for the workers once they entered the factory and periodically. Based on-site verification (including on-site observation, document review, management and workers interview), the management of the environment condition was acceptable. Monitoring actions like internal audit, management interview was done regularly to monitor the environmental condition of the factory.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 9](#)

Systems and evidence examined to validate this code section

Current system

The factory had obtained the provided certificate from local environmental administration bureau to prove them complied with local law. The environment policy and procedure to ensure that meeting applicable environmental laws was established in the factory. The auditee had collected relevant environment protection laws and regulation. Relevant procedure was established to protect environment and save energy such as electricity, water source and etc. The auditee obtained the approved written environmental program of the facility, the written plan of environmental project and chemical industry approval document.

Evidence examined – to support system description

Document review (Environmental policies, training records, legal required environmental permits, the approved written environmental program of the facility, the written plan of environmental project).

Worker interview

Management interview

Factory tour

[← Code area 9](#)

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

All legal required environmental documents and certificates were checked.

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

[← Code area 10.A](#)

Attachments



[Factory name.JPG](#)



[Factory gate.JPG](#)



[Production building A.JPG](#)



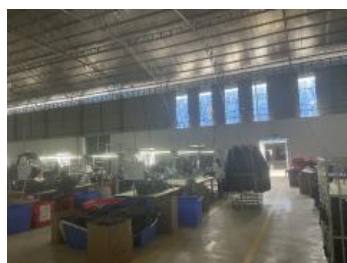
[Production building B.JPG](#)



[Cutting workshop.JPG](#)



[Sewing workshop.JPG](#)



[Inspection and packing area.JPG](#)



[Warehouse.JPG](#)



[Drinking ater.JPG](#)



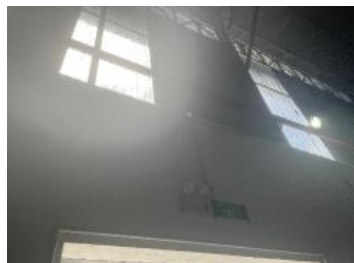
[Employee private locker.JPG](#)



[Employee toilet.JPG](#)



[Evacuation map.JPG](#)



[Exit sign and emergency light.JPG](#)



[Fire alarm.JPG](#)



[Fire extinguisher.JPG](#)



[Fire hydrant.JPG](#)



[First aid kit.JPG](#)



[Suggestion box.JPG](#)



[Timecard machine.JPG](#)



[NC hot-drying machine without shield.JPG](#)



[NC cutting employee did not wear provided dust-proof mask.JPG](#)



[10251321892_SMETA_2_Pillar_INSPIROR_BAG_\(CAMBODIA\)_MANUFACTURING_CO_LTD_Cambodia_22_23_Jul_2025_CAPR_\(Signed\).pdf](#)

