

Monitored Party DongGuan Digiview Technology Limited	amfori ID 156-009249-000	Address Room 903,Building 3,No.36,Fuxing Road,Chang'an Town, 523795 Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 27/03/2025	Closing Meeting Finished Date 28/03/2025	Submission Date 03/04/2025
Expiration Date 03/04/2026	Announcement Type Semi Announced	
Site DongGuan Digiview Technology Limited	Site amfori ID 156-009249-002	

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OVERALL RATING



SECTION RATING

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

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

GENERAL DESCRIPTION

Name of lead auditor: Cathy Duan, APSCA membership number: CSCA 21700031.

Monitoring partner name: TUV Rheinland.

Audit schedule details: The audit is planned for 1 auditor in 1.5 days.

Announcement Type: Semi-Announced audit.

Business partner information: The auditee was established on 8 April 2020 and located at Room 903, Building 3, No.36, Fuxing Road, Chang'an Town, Dongguan, Guangdong, China(中国广东省东莞市长安镇复兴路36号3号楼903室). The main products manufactured by the auditee were Bluetooth earphone, Bluetooth speaker, Wireless charging, Car charging, Power bank, Wall chargers, Charging Cables and TWS. The main production processes included injection molding, assembly, aging and packing. No production process was subcontracted. There was no obvious peak season in the production.

Audited location information: The auditee rent and used the 9th floor of one 10-storey production buildings for office, warehouse and workshop (wire producing, assembling, aging, packing, etc.). The total used construction area was about 3750 square meters. No canteen/kitchen, dormitory and transportation were provided for workers. Remark: The other floors of the production building were rented by other factories, which were specialized in the manufacturing of different products and had independent business licenses with different corporative representatives. The lease contract was provided for review. Per onsite tour, management representatives and worker interview, no shared workforce and workshop between the auditee and the other factories within the same building. There was the nameplated posted near each factory. Thus, other floors of the building were out of the audit scope.

Operating shifts and hours: Working hour records were provided by the auditee from 01 March 2024 to the first audit date. The regular working days defined by the auditee was from Monday to Friday, and the rest day was Saturday and Sunday. All workers were arranged in 1 shift and the working hours arranged as 08:00-12:00, 13:30-17:30. Working hour records from 13 sampled workers showed that the maximum daily overtime was 2 hours, the maximum weekly overtime hours was 16 hours, and maximum monthly overtime was 62 hours. The maximum consecutive working days was 6 days. All overtime hours were conducted on voluntary basis.

Time recording system: The auditee used fingerprint and face recognition attendance machine to record the working time.

Salary payment details: Payroll records of 13 sampled workers from March 2024 to February 2025 were provided by the auditee. Wages were paid by cash on or before the 20th day of the following month. The wages of workers were calculated on hourly basis. The auditee paid employees a minimum wage of CNY11 per hour, which was a little higher than the local minimum wage. The minimum wage of Dongguan City was CNY 1900/month, equivalent to CNY10.92 per hour since 1 December 2021. Overtime on working days, rest days and statutory holidays were paid 1.5 times, 2 times and 3 times of the basic wages respectively. Post allowance, Full attendance bonus, Food and Housing subsidy was provided monthly. Meanwhile, the auditee also provided the high temperature allowance to workers from June to October.

Worker number information: Total 77 employees currently working in the factory, including 8 non-production employees and 69 production workers (including 32 male production workers and 37 female production workers). There was total 61 domestic migrant employees, including 24 were males and 37 were females. All employees were hired directly. No young worker, child labor, contracted worker and home worker was used.

Good practices: The auditee provided food and housing subsidy to employees.

Worker organization details: No union was established in the factory; 2 worker representatives were voted by workers on 14 May 2024 based on fair and democratic basis.

Circumstances: All areas were open for site observation. Finally, management representatives and one worker representative agreed all findings and signed the findings report. There was no special circumstance during the audit.

Summary of findings:

PA 1: insufficient management system and incomplete capacity planning.

PA 2: insufficient content of long-term goals.

PA 5: insufficient social insurance

PA 6: monthly overtime systematically exceeded 36 hours.

PA 7: no workplace occupational hazard monitoring report and no occupational health examination report, insufficient injury insurance, machine buttons were not marked functions.

PA 12: no environment impact assessment document

Living wage calculation:

#LivingWage

- a. No anker wage available for the producer location, so we used the data provided by auditing company;
- b. The calculation methodology refers to anker living wage structure;
- c. The data comes from the local bureau of statistics for the current year.

Attachment:

1. The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit.
2. No government waiver was obtained. No labor agency was used. No contractor was used. No collective bargain agreement was in place.

SITE DETAILS

Site

DongGuan Digiview Technology Limited

Site amfori ID

156-009249-002

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Household Durables

Sub Industry

Consumer Electronics

amfori Process Classifications

Assembly / installation of pieces / parts / screws / cover

NACE Classification

Manufacture of consumer electronics

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	77	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	1,914	Monthly
Calculated living wage in local currency	2,293.16	Monthly
Total sample	13	Workers

Other Metrics

Male workers	35	Workers
Female workers	42	Workers
Non-binary workers	0	Workers
Permanent workers - Male	35	Workers
Permanent workers - Female	42	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	1	Workers
Management - Female	2	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	24	Workers
Domestic migrant workers - Female	37	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
Workers hired directly - Male	35	Workers
Workers hired directly - Female	42	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - 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
Sample - Male	6	Workers
Sample - Female	7	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially adhered to this principle based on document review, onsite observation, management interview and worker interview. The auditee had established a series of relevant social responsibility procedures in accordance with the amfori BSCI Code of Conduct and local laws and regulations and designated special persons to implement relevant procedures, the auditee implemented and monitored most of the performance areas, however, there were deficiencies in some performance areas, e.g. control of overtime working hours, social insurance coverage, management of environment protection, health and safety, etc. The management representatives confirmed that they had identified some shortage in the implementation of amfori BSCI COC in daily operation, however, some findings would take time to improve gradually, and they were willing to make achievable and effective measures to narrow the gap gradually. It violated the requirements in the amfori BSCI system manual.</p>	<p>基于文件查阅，现场观察，管理层访谈和员工访谈，被审核方部分遵守该原则。被审核方有按照 amfori BSCI 行为守则和当地的法律法规建立了一系列的社会责任程序，并指定专人执行相关程序，被审核方对大部分绩效领域进行了实施和监控，但在部分执行领域存在不足，如工作时间管控，社会保险覆盖，环保、健康和安全的管理等。管理代表确认，他们在日常运作中发现了 amfori BSCI COC 执行的不足之处，但有些发现需要时间逐步改善，他们愿意采取切实可行的有效措施，逐步缩小差距。违反了 amfori BSCI 系统手册的要求。</p>

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially adhered to this principle based on document review, onsite observation, management interview and worker interview. The auditee established a written cost accounting and capacity planning management procedure, but the auditee failed to develop and execute a sound plan to meet the customer's expectations, resulting that the monthly overtime systematically exceeding 36 hours in the sampled months. Management representatives explained that due to staff</p>	<p>基于文件查阅，现场观察，管理层访谈和员工访谈，被审核方部分遵守该原则。被审核方建立了书面的成本核算和产能规划管理程序，但是被审核方未能制定并执行一个完善的计划来满足客户的期望，导致抽样月份的月加班系统性超过36小时。管理人员解释由于人员紧缺和紧急的生产订单，很难合理安排生产计划，但是所有的加班都是在自愿的基础上进行。（详见6.2）违反了 amfori BSCI 系统手册的要求。</p>

Finding

shortages and urgent production orders, it was difficult to properly arrange production schedules, but all overtime was done on a voluntary basis (Refer to 6.2 for details). It violated the requirements in the amfori BSCI system manual.

PA 2: Workers Involvement and Protection

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

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

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially adhered to this principle based on management interview, worker interview and document review. The auditee had defined long-term goals to protect employees based on the mission or vision of amfori BSCI or its performance, however, the auditee had not developed a gradually executable plan and failed to provide evidence to show that they monitored the long-term goals during the actual operation. The management representative indicated that the auditee had taken steps in its daily operations to gradually close the gap with the long-term goal but had not been documented. It violated the requirements in the amfori BSCI system manual.

基于管理层访谈，工人代表访谈以及文件评审，被审核方部分遵守了该原则。被审核方有根据amfori BSCI使命或愿景或其amfori BSCI表现去定义长期的目标去保护员工，但并没有制定逐步可执行的计划，也未能提供证据显示在日常运作中有对长期目标进行监管。管理代表表示被审核方在日常运作中有采取措施逐步缩小与长期目标的差距，但是没有形成书面的文件。违反了amfori BSCI系统手册中的要求。

PA 5: Fair Remuneration

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

Question: 5.5 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

The auditee partially adhered to this principle based on document review, management interview and worker interview. The auditee only purchased social insurance for some employees, rather than all eligible employees. During the audit period, the auditee had 77 employees, including 3 employees

基于文件评审，管理层访谈和工人访谈，被审核方部分遵守该原则。被审核方只为部分员工购买了社保，而不是所有符合条件的员工。审核期间被审核方有77名员工，包含了3名达到退休年龄的员工和5名入职不足1个月的新员工，69名员工需要参加社保。被审核方通过社保平台展示了过去1年的社保购

Finding

reached retired age and 5 new employees who had been employed for less than a month, 69 employees were required to participate in social insurance. The auditee displayed their social insurance purchase records over the past year through the social insurance platform. The auditee did not provide pension insurance, unemployment insurance, maternity insurance, work-related injury insurance and medical insurance for 41 out of 69 eligible employees. Management interview and worker interview showed that social insurance was purchased voluntarily, some workers wanted to gain more disposable income and did not want to bear the individual part of social insurance, and some employees had already purchased the new rural cooperative medical insurance. Remark: The auditee purchased group accident insurance valid from 19 April 2024 to 18 April 2025 for 42 employees, covering all the uninsured eligible employees, there were still 7 employees not covered by any work-related injury insurance. It violated the articles 10, 23, 33, 44 and 53 of the Social Insurance Law of the People's Republic of China.

买情况。被审核方没有为符合条件的69名员工中41名员工提供养老保险，失业保险，生育保险，工伤保险和医疗保险。管理层访谈和工人访谈显示，社保是自愿购买的，部分员工想多点可支配的收入而不愿意承担社保个人部分的费用，部分员工在家乡已经参加了新农村合作医疗。备注：被审核方为42名员工购买了有效期从2024年4月19日到2025年4月18日的团体意外保险，覆盖了所有应参保但是未参保的员工，目前还有7名员工没有被任何工商保险。违反了《中华人民共和国社会保险法》第10，23，33，44，53条。

PA 6: Decent Working Hours

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

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

ENGLISH

Finding

The auditee did not comply with this principle based on document review, management interview, and worker interview. The monthly overtime of workers systematically exceeded the legal requirement (no more than 36 hours per month). During the audit period, the auditee provided attendance records of 13 randomly sampled employees from 1 March 2024 to the first audit date. The peak-low season in production of the auditee was not obvious. Attendance records of three months were randomly sampled and cross-validated with production records, wage records and worker interview. It was found that all sampled employees worked overtime more than 36 hours

LOCAL LANGUAGE

基于文件查阅，管理层访谈和工人访谈，被审核方未遵守该原则。工人的月加班系统性超出法规的要求（每月不超过36小时）。审核期间，被审核方提供了随机抽样的13名员工从2024年3月1日至审核第一天的考勤记录。被审核方生产没有明显的淡旺季，随机抽样3个月的考勤记录与生产记录，工资记录和员工访谈进行交叉验证，发现所有抽样员工在2024年7月份的月加班超过36小时，最大达到62小时；所有抽样员工在2024年9月份的月加班超过36小时，最大达到60小时；所有抽样员工在2024年12月加班超过36小时，最大达到62小时。员工访谈显示加班都是在自愿的基础上进行的。管理层表示基于生产成本和工人意愿的考虑，目前未能将月加班控制在36小时以内。备注：被审核方当前支付月份为

Finding

per month in July 2024, the maximum was 62 hours; all sampled employees worked overtime more than 36 hours per month in September 2024, the maximum was 60 hours; all sampled employees worked overtime more than 36 hours per month in December 2024, the maximum was 62 hours. Interview with workers and management representatives showed all overtime work was conducted on voluntary basis. Management representatives expressed that due to production costs and workers' wishes, they were currently unable to limit overtime to 36 hours per month. Remark: The current payment month of the auditee was February 2025, but due to the Spring Festival holiday arranged by the auditee in January and February 2025, January and February 2025 were not taken as the sample months. The maximum monthly overtime in January, February and March (as of 27 March 2025) were 56 hours, 56 hours and 54 hours. It violated the article 41 of the Labor Law of the People's Republic of China.

2025年2月，但是由于被审核方在2025年1月和2月安排了春节假期，故未将2025年1月和2月作为抽样月份。2025年1月，2月和3月份（截止到2025年3月27日）的最大月加班分别为56小时，56小时和54小时。违反了中华人民共和国劳动法第41条。

PA 7: Occupational Health and Safety

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

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

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on documents review, onsite observation and interview with management and workers. (1) The auditee's production workshop had the potential occupational hazard factors of dust, noise and chemical hazards, but the auditee failed to provide the monitoring report of occupational hazard factors in the workplace for review during the audit. (2) During the audit period, the auditee also failed to provide pre-job, on-the-job and off-job occupational health examination reports of employees exposed to occupational hazards for review. The management representative said that it would contact qualified institutions to monitor the occupational hazard factors and arrange occupational health examinations for employees exposed to occupational hazards according to the

基于文件审核，现场审核，管理层和工人访谈，被审核方部分遵守该原则。（1）被审核方生产车间潜在的职业病危害因素有粉尘，噪声和化学品危害，但是评估期间被审核方未能提供工作场所职业病危害因素检测报告以供查阅。（2）审核期间，被审核方也未提供接触职业危害的员工的岗前，在岗和离岗职业健康体检报告以供查阅。管理代表表示会联系有资质的机构进行职业病危害因素检测并根据检测结果对接触职业危害的员工安排职业健康体检。违反了工作场所职业卫生管理规定（2021）第20条和中华人民共和国职业病防治法第三十五条。

Finding

monitoring results. It violated the Provisions on the Administration of Occupational Health at Work Sites (2021), article 20 & Law of the People's Republic of China on Prevention and Control of Occupational Diseases, article 35.

Question: 7.2 Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle based on document review, worker interview and management interview. During the audit period, the auditee had 77 employees, 28 of whom participated in work-related injury insurance, 42 employees participated in commercial accident insurance, and 7 employees were still not covered by any work-related injury insurance. It violated PRC Social Insurance Law Article 33.

基于文件审核，员工访谈和管理层访谈，被审核方部分遵守该原则。审核期间被审核方有77名员工，其中的28名参加了工伤保险，42名员工参加了商业意外保险，仍有7名员工没有被任何工商保险覆盖。这违反了中华人民共和国保险法第三十三条。

Question: 7.17 Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially adhered to this principle based on worker interview, onsite observation and management interview. The buttons of the vertical injection molding machine were not marked their functions in Chinese. The management representative stated that employees were provided trainings on equipment operation before taking up their posts, and they would arrange to label the functions of buttons in Chinese as soon as possible. It violated the Work Safety Law of the People's Republic of China, article 35.

基于员工访谈，现场审核和管理层访谈，被审核方部分遵守该原则。立式注塑机的按钮没有用中文标识其功能。管理代表表示员工上岗前都有进行过设备操作的培训，他们也会尽快安排用中文标识按钮的功能。违反了中华人民共和国安全生产法第35条。

PA 12: Protection of the Environment

Site: DongGuan Digiview Technology Limited | Site amfori ID: 156-009249-002

Question: 12.1 Is there satisfactory evidence that the auditee continuously identifies the significant impacts and environmental implications associated to its activity?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially respected this principle based on document review, onsite observation and management interview. The auditee's main processes included injection molding, soldering, testing, aging, assembly and packaging, but the auditee failed to provide the environmental impact assessment documents of the construction project during the audit, such as environmental impact report form, approval and environmental acceptance. The management representative said that the 10 small vertical injection molding machines were be put into operation until January 2025, and they had already set about to contact qualified organizations to handle the EIA related matters. It violated the Environmental Impact Assessment law, article 16 and 22, Management Regulations for Environmental Protection of Construction Projects, article 17.</p>	<p>基于文件审核，现场审核和管理层访谈，被审核方部分遵守该原则。被审核方主要的工序有注塑，焊锡，测试，老化，组装和包装，但是审核期间被审核方未能提供该建设项目的环境影响评价文件，如环境影响报告表、批复和环保验收等。管理代表表示这10台小型立式注塑机2025年1月才投入使用，他们已经开始联系有资质的机构着手办理环评相关事宜。违反了中华人民共和国环境影响评价法 第16和22条；建设项目环境保护管理条例 第17条。</p>