

Monitored Party Qingdao Toposh Jewelry Co.,Ltd	amfori ID 156-046293-000	Address Room201, Floor2, Building23, No.6 Changcheng South Road, Chengyang District, 266109 Qingdao, Shandong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TÜV SÜD
Monitoring Start Date 14/04/2025	Closing Meeting Finished Date 14/04/2025	Submission Date 22/04/2025
Expiration Date 22/04/2026	Announcement Type Semi Announced	
Site Qingdao Toposh Jewelry Co.,Ltd	Site amfori ID 156-046293-001	

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OVERALL RATING



SECTION RATING

PA1: Social Management System	D	
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	B	
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: Vivian Li; APSCA membership number: CSCA21701816

Name of team auditor (if applicable): Nil

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

Monitoring partner name: TUV SUD

Audit schedule details: The audit is planned for 1 auditor x 1 day on Apr. 14, 2025.

Announcement Type: Semi-announced audit

Business partner information: The audited factory named Qingdao Toposh Jewelry Co., Ltd (Uniform Code of Social Credit: 91370214MAC5QJFM2F) was located at Room 201, Floor2, Building 23, No.6 Changcheng South Road, Chengyang District, Qingdao City, Shandong Province, China. The factory was established on November 30, 2022. The main business product was imitation jewelry. The main production processes included assembly, inspection and packing. The registered address on the business license was Room 201, Floor2. The address used by factory was 1st floor to 6th floor.

Audited location information: The factory used 1st floor to 6th floor of one 7-storey (-1F-6F) building as office, workshop and warehouse (1st floor was assembly workshop and warehouse, 2nd floor was inspection, packing workshop and warehouse, 3d floor to 5th floor were office, 6th floor was canteen). No dormitory was provided by the facility. The building was owned by the factory. The factory bought the building from Qingdao Xinli Weiye Real Estate Development Co., Ltd. The factory rented -1F floor to Qingdao Sunjoy Jewelry Co., Ltd (products imitation jewelry), provided the lease contract and business license to auditor for review. Through worker's interview and management's interview, they claimed that the auditee and the other company were operated with independent management, no employees exchanged between the auditee and the other company, so the other company were not covered in this audit.

Operating shifts and hours: The regular working hours of all employees were 8 hours per day and 40 hours per week. The regular working days of workers were 5 days from Monday to Friday per week and generally had 8 hours overtime on Saturdays. All workers fixed rest on Sundays. All employees worked in one shift (8:30-12:00, 13:30-18:00). The attendance records indicated workers' maximum overtime hours were 2 hours per day, 66.5 hours per month and 17 hours per week. No overtime happened on Statutory holidays. There was no obvious peak or non-peak season in the factory.

Time recording system: The factory used face detection to record working hours of all employees.

Salary payment details: All employees were paid by monthly rate and the wages were paid in cash on the 15th of each month for the preceding month.

Worker number information: On the audit day, there were total 50 workers working in the factory, that included 40 production workers (3 males and 37 females) and 10 non-production employees (including 3 management staffs). There was no domestic migrant and foreign migrant worker in the factory. The factory did not have young worker, pregnant worker, seasonal worker, temporary worker, disabled worker, or home-based worker. The factory also did not have other special group workers such as interns, apprentices, contractor workers etc.

Good practices: Nil

Worker organization details: The factory did not have trade union; however, two worker representatives were elected by workers.

Circumstances: 1. There was no agency or contractor used by the factory, and no government waivers and collective bargaining agreement were provided during the audit.

2. No inconsistencies between time records and production records were observed.

3. There was no chemical observed in the factory during the audit.

4. Remark: There is Personal Information Protection Law in China. Hence, the personal information of employees is removed from the uploaded documents.

Summary of findings: In this audit, non-compliances were observed in five performance areas, please refer to PA1; PA2; PA5; PA6; PA7 for details.

Living wage calculation: #living wage, the data on GLWC website was not used, but the calculation method still follows Anker's methodology. The data were mainly manually collected through local market investigation and worker interview by auditor.

SITE DETAILS

Site
Qingdao Toposh Jewelry Co.,Ltd

Site amfori ID
156-046293-001

GICS Classification

Sector	Industry Group	Industry
Consumer Discretionary	Consumer Durables & Apparel	Textiles, Apparel & Luxury Goods

Sub Industry
Apparel, Accessories & Luxury Goods

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	50	Workers
Legal minimum wage in local currency	2,200	Monthly
Lowest wage paid for regular work at the site	2,400	Monthly
Calculated living wage in local currency	2,367	Monthly
Total sample	6	Workers

Other Metrics

Male workers	4	Workers
Female workers	46	Workers
Non-binary workers	0	Workers
Permanent workers - Male	4	Workers
Permanent workers - Female	46	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	0	Workers
Domestic migrant workers - Female	0	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	4	Workers
Workers hired directly - Female	46	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	1	Workers
Sample - Female	5	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: Qingdao Toposh Jewelry Co.,Ltd | Site amfori ID: 156-046293-001

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>This question was rated as partially because the factory had the policy and procedures on social management system in line with the requirements of BSCI; however, the procedures had not been implemented effectively, and no regular monitoring and continuous improvement was taken. There were still some performance areas which need improvement, for example: PA1; PA2; PA5; PA6; PA7.</p>	<p>这个问题部分遵守，原因是工厂建立了符合BSCI要求的社会责任政策和程序，但是这些程序没有有效的实施，定期监控和持续改进。当前审核在几个执行领域发现一些有待完善的地方，如：PA1; PA2; PA5; PA6; PA7。</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>Based on document review, management interview, worker interview and onsite review, the factory did not appoint staff to conduct productivity evaluation. Through reviewing the attendance records from Mar. 1 2024 to Apr. 14 2025, the monthly overtime hours of sampled months exceeded 36 hours and the maximum monthly overtime reached 66.5 hours. This question was rated as no because there was multiple unsatisfaction evidence at this question, and there are systematic deficiencies, such as workers' overtime hours systematically exceeding legal requirements. It violated BSCI Code of Conduct.</p>	<p>根据文件审阅，管理层访谈，员工访谈及现场审查，工厂没有指定员工进行生产力评估。通过查阅2024年3月1日至2025年4月14日的考勤显示，抽样月份的月加班时间超过36小时，最高月加班时间达到66.5小时。这个问题没有被遵守，原因是该问题点工厂有多个不符合证据，并且有系统性的缺失，如工人的加班时间系统性地超过法律要求。违反了BSCI行为准则。</p>



PA 2: Workers Involvement and Protection

Site: Qingdao Toposh Jewelry Co.,Ltd | Site amfori ID: 156-046293-001

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH	LOCAL LANGUAGE
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Finding

This question was rated as partially because based on document review, management interview, worker interview and worker representative interview, the factory established grievance policy but the written procedure did not define the content of Potential conflicts of interest and how to overcome them. It violated BSCI Code of Conduct.

这个问题部分遵守，原因是根据文件审阅，管理层访谈，员工访谈及员工代表访谈，工厂建立了申诉政策，但是书面的申诉程序中未包括潜在的利益冲突以及如何克服这些冲突。违反了BSCI行为准则。

PA 5: Fair Remuneration

Site: Qingdao Toposh Jewelry Co.,Ltd | Site amfori ID: 156-046293-001

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

Based on document review, management interview, worker interview and worker representative interview, the factory had 50 workers, it was noted that no temporary, dispatched, newly joined workers and retiree, according to social insurance receipt of Jan., Feb. and Mar. 2025, the factory provided five kinds of social insurance to 36% workers. And the factory provided group commercial injury insurance to 100% workers, the valid period was from Jan. 16 2025 to Jan. 15 2026. As per interview, reason for the workers not joining the social insurance was they were not willing to pay the individual parts. This question was rated as no because the factory did not have a management system in place to address the problem. It violated PRC Labor Act (1995), Article 72.

根据文件审阅，管理层访谈，员工访谈及员工代表访谈，工厂共有50名员工，工厂没有临时工、派遣工、新员工和退休工人，根据工厂提供的2025年1月，2月及3月的社保收据，工厂为36%的员工缴纳了五项社会保险，为100%的员工购买了团体商业意外险，有效期从2025年1月16日至2026年1月15日。根据访谈得知，员工没有参加社保的原因是工人不愿意支付个人部分。这个问题没有被遵守，原因是工厂没有适当的管理系统来解决该问题。违反了中华人民共和国劳动法（1995）第七十二条。

PA 6: Decent Working Hours

Site: Qingdao Toposh Jewelry Co.,Ltd | Site amfori ID: 156-046293-001

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

ENGLISH

LOCAL LANGUAGE

Finding

The factory provided attendance records from Mar.

工厂提供了从2024年3月1日至审核当日（2025年4

Finding

1 2024 to the audit day (Apr. 14 2025), according to the sampled attendance record of Dec. 2024, Jan. and Feb. 2025, the overtime working was repeatedly added outside regular working hours, 1-2 hours overtime on weekdays and 8 hours overtime on Saturday. Based on document review, management interview, worker interview, worker representative interview and onsite review, all the overtime work is arranged on voluntary basis. However, auditor selected 6 workers from assembly, inspecting and packing process, it was noted that 6 sampled workers' monthly OT hours exceeded 36 hours, the maximum number was up to 66.5 hours in Dec. 2024. This question was rated as no because the overtime working hours of all sampled workers did not meet legal requirement in all sampled months, it was systematic deficiency. It violated PRC Labor Act (1995), Article 41.

月14日)的考勤记录,根据抽样的2024年12月份,2025年1月份和2月份的考勤记录,工厂在正班时间之外有经常性的加班情况,工作日加班1-2小时,周六加班8小时。根据文件审阅,管理层访谈,员工访谈,员工代表访谈及现场审查,所有加班都是自愿的,但是,审核员从组装、检验和包装工序抽取了6名员工,发现抽样的6名员工的月加班时间超过36小时,最大达到66.5小时在2024年12月份。这个问题没有被遵守,原因是工厂所有抽样员工在所有样月份的加班都不符合法规要求,是系统性缺失。违反了中华人民共和国劳动法(1995)第四十一条。

PA 7: Occupational Health and Safety

Site: Qingdao Toposh Jewelry Co.,Ltd | Site amfori ID: 156-046293-001

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

ENGLISH

LOCAL LANGUAGE

Finding

This question was rated as partially because the factory generally followed occupational health and safety regulations, but some areas still need to be improved, such as PA7.4; PA7.8; PA7.11.

这个问题部分遵守,原因是工厂总体遵守职业健康安全法规,但一些地方仍需要进行改善,如PA7.4; PA7.8; PA7.11。

Question: 7.4 Is there satisfactory evidence of active cooperation between management and workers (and/or their representatives) when developing and implementing systems towards ensuring OHS?

ENGLISH

LOCAL LANGUAGE

Finding

This question was rated as partially because based on document review, management interview, worker interview, worker representative interview and onsite review, the factory established occupational health and safety committee. But no records showed workers and their representatives were involved in establishment of related OHS

这个问题部分遵守,原因是根据文件审阅,管理层访谈,员工访谈,员工代表访谈及现场审查,工厂设置了健康安全委员会。但是没有记录表明工人和工人代表参与工厂相关的OHS政策的建立,例如健康安全风险评估。违反了BSCI行为准则。

Finding	
policy such as health and safety risk assessment. It violated BSCI Code of Conduct.	

Question: 7.8 Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>This question was rated as partially because based on document review, management interview, worker interview, worker representative interview and onsite review, the audited factory had established accident and emergency procedures but did not display it onsite. It violated BSCI Code of Conduct. The factory explained that they provided relevant training to workers regularly, but it was not posted on site.</p>	<p>这个问题部分遵守，原因是根据文件审阅，管理层访谈，员工访谈，员工代表访谈及现场审查，被审核工厂建立了意外应急程序，但是没有在现场张贴。违反了BSCI行为准则。工厂解释他们会定期给员工进行相关的培训，但是没有张贴在现场。</p>

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>This question was rated as partially because based on document review, management interview, worker interview, worker representative interview and onsite review, the production buildings of the factory looked stable and safe based on the factory tour, and the factory had provided the building structure acceptance certificate and fire inspection certificate for all buildings. However, some goods in raw material warehouse were being stored against wall. The distance between goods and the wall was lower than the legal requirement of 0.5 meters. It violated Rules for Storage Fire Prevention Safety Management, Article 18. The factory explained that the workers had ignored the problem when they placed them and the training and supervision for the workers would be strengthened in the future.</p>	<p>这个问题部分遵守，原因是根据文件审阅，管理层访谈，员工访谈，员工代表访谈及现场审查，工厂的生产建筑在外观上是稳固和安全的，并且工厂提供了所有建筑的竣工验收合格证和消防验收合格证书。但是，原料仓库内部分货物靠墙放置。货物跟墙之间的距离低于法规规定的0.5米。违反了仓库防火安全管理规则 第18条。工厂解释工人在摆放的时候忽视了这个问题，后续会加强对员工的培训与监督。</p>