

Monitored Party Dongguan Fitwell Headwear&Bag Co., Ltd.	amfori ID 156-025901-000	Address Room 401, No. 491, Zhongxin Road, Shipai Town, Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner Intertek
Monitoring Start Date 20/03/2025	Closing Meeting Finished Date 27/03/2025	Submission Date 27/03/2025
Expiration Date 27/03/2026	Announcement Type Semi Announced	
Site Dongguan Fitwell Headwear & Bag Co., Ltd.	Site amfori ID 156-025901-002	

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OVERALL RATING



SECTION RATING

PA1: Social Management System	D	
PA 2: Workers Involvement and Protection	C	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	C	
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: Cindy Bai; APSCA membership number: CSCA 21700282

Name of team auditor (if applicable): N/A; APSCA membership number: N/A

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

Monitoring partner name: Intertek

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

Announcement Type: Semi-announced

Business partner information: Dongguan Fitwell Headwear & Bag Co., Ltd. / 东莞市戴得舒帽袋有限公司. (Uniform Social Credit Number: 91441900314870228P) is located at Room 401, No. 491, Zhongxin Road, Shipai Town, Dongguan City, Guangdong Province, China. / 中国广东省东莞市石排镇石排中心路491号401室. The total land area occupied by the facility is about 1650 square meters. The facility had obtained the business license since September 3, 2014 and they had started their operation and relocated to the existing location since October 2022.

The main products manufactured by the facility are headwear and bags.

The main production processes were listed as follows: cutting, sewing, embroider, molding and packing.

The production capacity was 1000000 pieces per year.

The main used machines are cutting machine, sewing machine, molding machine and embroider machine.

Audited location information: The buildings were rented from landlord. In view of the facilities, the facility consists of whole 4/F of one 6-storey building as production floor, office and warehouse, no dormitory, kitchen or canteen was available in the facility. Details of floor information for the buildings were listed as below:

Production building with 6-storey: 1/F- 3/F: Other facilities 4/F: Office, warehouse, cutting, sewing, embroider, molding and packing 5/F- 6/F: Other facilities

Operating shifts and hours: The attendance records from March 1, 2024 to March 20, 2025 were reviewed at this audit.

Based on the provided attendance records, the employees in all departments regularly worked for 8 hours per day and 5 days per week in 1 shift. The regular working hour was from 08:00 to 17:30 with 1.5 hours' break from 12:00 to 13:30.

Employees normally worked 2 hours on normal working days and 8 hours on Saturdays. No overtime was conducted on Sundays and statutory holidays. Finger print attendance system was used for time keeping and employees should scan their fingers when they went in and out the workshop. The peak season was not obvious every year as per facility management. Based on the sampled attendance records provided by the facility, the maximum overtime hour per day were 2 hours, the maximum weekly working hours were 54 hours and the maximum consecutive working days were 6 days.

Time recording system: Finger print attendance system was used for time keeping.

Salary payment details: The payroll records from March 2024 to March 2025 were reviewed at this audit. Employees' wages were calculated on hourly rated and piece rated basis. The lowest basic wages were RMB2436 per month, which was higher than the legal requirement. For overtime wages, 150%, 200% of basic wages were paid to employees for their overtime hours on normal working days and rest days respectively. There was no overtime hour on public holidays. Employees were paid by cash on or before 30th of each month after the previous wage calculation cycle.

Worker number information: A total of 43 employees including 28 production employees (7 males and 21 females) and 15 non-production employees (6 males and 9 females) are working in the facility. 12 employees (3males and 9 females) are local employees from Guangdong province, 31 employees (10 males and 21 females) were migrant employees from Henan province, Guangxi province, Guizhou province, Sichuan province and Anhui province.

Good practices: None

Worker organization details: Worker organization details: No labor union was established in the facility, but one committee with one worker representative was available in the facility. The worker representative was elected by all employees freely.

Circumstances: There was no special circumstance during the audit.

Summary of findings:

PA1:

1.1 Some violations were found in the PA1, PA2, PA5, PA6 and PA7 in this audit.

1.4 During document review, auditor found that the facility did not have satisfactory evidence to prove that the workforce capacity was properly organized to meet the expectations of the delivery order and/or contracts due to excessive overtime.

PA2:

2.2 Though the facility had established the target of social responsibility according to the local law and BSCI Code of Conduct, however, the facility did not define the target time and the step-by-step approach toward sustainable improvements.

2.4 As per workers' interview, all interviewed employees were not clear of the specific sections for amfori BSCI Code and some relevant content and requirements.

PA5:

5.4 The facility did not calculate local living wage.

5.5 Insufficient social insurance participation.

PA6:

6.2 The monthly overtime hours exceeded local law's requirement.

PA 7:

7.1.1 Finding violated local law was found in 7.1 and 7.17 in this PA.

7.1.2. No pre job or post job occupational diseases examination for these employees exposed to occupational hazards was provided by the facility.

7.1.3. No training records or certificate of safety production knowledge and management skill of the principal in charge and the person for the management of work safety.

7.17. Insufficient needle guard and safety belt guard equipped for sewing machines.

Living wage calculation: #LivingWage Anker methodology is used for Living Wage calculation by auditing company.

Remark:

1. Below documents were not uploaded to the report:

- 1) There were no agencies used by the auditee, thus, no agency labor contract;
- 2) There were no government waivers provided by the auditee in this audit;
- 3) There were no collective bargaining agreements in the facility;
- 4) There were no contractors used by the auditee, thus, no contractor license/permit.

2. According to Classified management directory of environmental impact assessment of construction projects (2021), the facility was released from obtain Environment document includes EIA document, EIA approval and EPCA. So no environment related document was uploaded.

3. During this audit, it was noted that there were many facilities with independent business licenses in the same building. As per facility management, these facilities were separated with the auditee in production, personnel and finance, the other facilities had separate business licenses and management, and there was no employees' cross utilize between auditee and other facilities. The other facilities did not allowed auditor to view the business licenses or conduct site tour. According to employees' interview, they said that they did not go to the other facilities to work and did not see the employees from the other facilities working in the audited facility. This audit only covered the area of the auditee.

SITE DETAILS

Site	Site amfori ID
Dongguan Fitwell Headwear & Bag Co., Ltd.	156-025901-002

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.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	43	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	2,436	Monthly
Calculated living wage in local currency	2,073.76	Monthly
Total sample	8	Workers

Other Metrics

Male workers	13	Workers
Female workers	30	Workers
Non-binary workers	0	Workers
Permanent workers - Male	13	Workers
Permanent workers - Female	30	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	2	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	10	Workers
Domestic migrant workers - Female	21	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	13	Workers
Workers hired directly - Female	30	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	3	Workers
Sample - Female	5	Workers
Sample - Non-binary	0	Workers

FINDINGS

PA1: Social Management System

Site: Dongguan Fitwell Headwear & Bag Co., Ltd. | Site amfori ID: 156-025901-002

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

1.1 The factory had established social compliance policy and procedures based on amfori BSCI standards. However, the facility did not set up a fully effective management system to implement the amfori BSCI Code of Conduct and some non-compliances were identified during the audit in some performance areas, such as overtime control and Health and safety management. The question was scored partial because the facility had implemented the amfori BSCI Code of Conduct well in other performance area, such as, Child Labor and Special Protection for Young worker etc. This finding was against amfori BSCI Code of Conduct, Principle on Social Management System and Cascade Effect.

1.1企业基于amfori BSCI标准建立起了一套社会责任政策和程序，但企业未能建立一个完全有效的amfori BSCI管理体系以执行amfori BSCI行为守则的要求，当前审核在几个执行领域发现一些有待完善的地方，比如加班管控和健康安全管控。这个问题点是部分符合，因为工厂在其他部分已经很好的执行了amfori BSCI行为守则的要求，比如童工和未成年工特殊保护等部分。
这个问题违反了amfori BSCI社会责任要求，社会管理体制与连接效应原则。

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

1.4 During document review, auditor found that the facility did not have satisfactory evidence to prove that the workforce capacity was properly organized to meet the expectations of the delivery order and/or contracts due to excessive overtime. For details, please refer to PA 6. The question was scored "no" because sample employees' monthly overtime hours exceeded legal requirement systematically. This finding was against BSCI Code of Conduct, Principle on Social Management System and Cascade Effect.

1.4在文件审阅时，审核员发现企业没有满意的证据来证明劳动力被正确安排以满足客人订单的期望，因为员工超时加班。具体请参考绩效领域第6部分。这个点的评级是不合格，原因是抽取的员工，其月加班时间系统性的不符合法规要求。该问题点违反了BSCI行为准则-供应链管理与级联效应。

PA 2: Workers Involvement and Protection

Site: Dongguan Fitwell Headwear & Bag Co., Ltd. | Site amfori ID: 156-025901-002

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

2.2 Through document review, it was noted that though the facility had established the target of social responsibility according to the local law and BSCI Code of Conduct, however, the facility did not define the target time and the step-by-step approach toward sustainable improvements. The question was scored partial because only target time and the step-by-step approach toward sustainable improvements had not been defined, and the facility management did not clear the details requirement. This finding was against amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection.

2.2通过文件审核，发现工厂虽然有制定社会责任目标，但是没有目标时间及如何逐步达到该目标的机制。此问题评级为部分符合是因为只有目标时间及如何逐步达到该目标的机制没有定义，同时工厂的管理层不清楚具体要求。这个问题违反了BSCI行为守则中的员工参与和保护原则。

Question: 2.4 Is there satisfactory evidence that the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation?

ENGLISH

LOCAL LANGUAGE

Finding

2.4 As per workers' interview, all interviewed employees were not clear of the specific sections for amfori BSCI Code and some relevant content and requirements, even the facility had provided relevant training to them. The question was scored "No" because this is a systematic issue. This finding was against amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection.

2.4通过员工面谈，所有的被访谈员工不清楚amfori BSCI行为守则的具体部分的相关内容和要求，即使工厂有给他们做了相关的培训。此问题评为不符合这是一个系统性的问题。此问题点违反了BSCI行为守则工人参与保护。

PA 5: Fair Remuneration

Site: Dongguan Fitwell Headwear & Bag Co., Ltd. | Site amfori ID: 156-025901-002

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

LOCAL LANGUAGE

Finding

5.4 Through management interview, the facility did not collect the information and calculate the living

5.4 通过管理层访谈，工厂未进行生活工资信息收集和计算以识别其实际支付的工资和生活工资之间的

Finding	
wages to identify possible gaps existing between the actual remuneration and the living wages. So this question was scored “No” because this was a systemic issue. This finding was against amfori BSCI Code of Conduct, Principle on Fair Remuneration.	差距。所以此问题点为不符合，因为这是个系统性问题。此问题点违反了amfori BSCI行为准则：公平报酬。

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	
<p>5.5 As per documentation review and facility management interview, 12 months’ social insurance receipts from April 2024 to March 2025 were reviewed. Based on the records of March 2025, auditor noted that there were total 43 employees in the facility, including 7 employee rehired from retirement and no newly joined employee, 36 employees are eligible for social insurance, 20 out of 36 employees (55.6%) had participated in basic endowment insurance, unemployment insurance, employment injury insurance, basic medical insurance and maternity insurance. Remark: 1) The facility had purchased commercial injury insurance for 23 employees, which the valid is from March 6, 2025 to March 5, 2026. 2) Interviewed workers stated that they did not want to participate social insurance. 3) No temporary and dispatch workers were used; 4) 7 retirees and no newly jointed workers working in the facility. So the question was scored “No” because less than 80% of employees had participated in social insurances. Local Law: In accordance with the Social Insurance Law of the People’s Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees.</p>	<p>5.5通过文件审核和工厂管理层面谈，审核员查看了2024年4月到2025年3月份的社保记录，根据2025年3月份的社保记录，审核员发现工厂共43人，包含7名退休返聘人员没有新进员工，36名员工符合买社保，其中20人 (55.6%) 参加了养老保险，失业保险，工伤保险，医疗保险和生育保险。备注：1) 企业有给23名员工购买商业意外险，有效期是2025年3月6日到2026年3月5日。2) 面谈的员工表示她/他们不愿意参加社保；3) 企业没有雇用临时工和劳务派遣工；4) 企业有7名退休返聘员工没有新进员工。因此这个问题的评级是“不符合”因为工厂少于80%的员工购买社保。法规要求：依据《中华人民共和国社会保险法》第十条，职工应当参加基本养老保险，由用人单位和职工共同缴纳基本养老保险费。第二十三条 职工应当参加职工基本医疗保险，由用人单位和职工按照国家规定共同缴纳基本医疗保险费。第三十三条 职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。第四十四条 职工应当参加失业保险，由用人单位和职工按照国家规定共同缴纳失业保险费。第五十三条 职工应当参加生育保险，由用人单位按照国家规定缴纳生育保险费，职工不缴纳生育保险费。</p>

PA 6: Decent Working Hours

Site: Dongguan Fitwell Headwear & Bag Co., Ltd. | Site amfori ID: 156-025901-002

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

LOCAL LANGUAGE

Finding

6.2 Through document review, auditor found that the monthly overtime hours of 8 out of 8 employees were 52 hours in September 2024 (random month), 8 out of 8 employees were 58 hours in June 2024 (random month). The question was rated as "no" because sample employees' monthly overtime hours exceeded legal requirement systematically. Remark: The monthly overtime hours of 8 out of 8 employees were 22 hours in January 2025 (current month), which was within 36 hours per month. Law/ COC: In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

6.2通过文件审核，审核员发现在抽取的2024年9月《随机月》的考勤中，随机抽取8员工名中的9名员工的月加班时间是52个小时，2024年6月《随机月》的考勤中，随机抽取的8名员工中的8名员工的月加班时间是58个小时。这个问题点评级是不符合，原因是抽取的员工月加班时间是系统性的不合法规范要求。备注：2025年1月《当前月》的考勤中，随机抽取的8名员工中的8名员工的月加班时间是22个小时，在每个月36个小时以内。法规/行为准则：依据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。

PA 7: Occupational Health and Safety

Site: Dongguan Fitwell Headwear & Bag Co., Ltd. | Site amfori ID: 156-025901-002

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

ENGLISH

LOCAL LANGUAGE

Finding

7.1 1. The facility did not effective implemented health and safety system and law requirement, detailed as the findings of PA7. This checkpoint was rated as "No" due to the facility need to enhance health and safety system. This finding was against amfori BSCI Code of Conduct, Principle on Occupational Health and Safety.
2. During facility tour, auditor found that there was thinner used in the workshops and noise existed at

7.1 1. 企业未有效的执行法规的要求和健康安全体系，详情请见PA7的发现点。这个检查点判定“不符合”是因为企业应在健康安全体系中提高自己的表现。这个问题违反了BSCI行为守则中的职业健康和安全原则。
2. 在现场巡查时，审核员发现工厂的车间使用天那水，并且绣花工序存在噪音。但是，企业没有提供岗前和离岗职业健康检查给接触职业危害的人员。这个检查点判定“不符合”是因为企业没有安排足够的

Finding	
<p>embroider process. However, no pre job or post job occupational diseases examination for these employees exposed to occupational hazards was provided by the facility. This checkpoint was rated as “No” due to there was insufficient employee participate in occupational diseases examination in the facility. Law/COC: In accordance with the PRC Law of Prevention and Control of Occupational Diseases Article 35, the employer shall conduct regular occupational health examination for those labourers who are engaged in works with occupational hazard(s) as required by production safety supervision and administration department and public health administrative department under the State Council.</p> <p>3. During document review, auditor found that the facility could not provide the training records or certificate of safety production knowledge and management skill of the principal in charge and the person for the management of work safety for review. This checkpoint was rated as “No” due to the facility has not obtained training records or certificate of safety production knowledge and management skill of the principal in charge and the person for the management of work safety. Law/ COC: In accordance with the Law of the PRC on Work Safety Article 24, The principal in charge and persons for the management of work safety in production and business entities have to have the knowledge about work safety and the competence for the management, which are commensurate with the production and business activities of these entities.</p>	<p>员工参加职业健康检查。法规/行为准则：依据《中华人民共和国职业病防治法》第三十五条，对从事接触职业病危害的作业的劳动者，用人单位应当按照国务院安全生产监督管理部门、卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。</p> <p>3. 在文件审核时，企业无法提供该企业安全管理人员和主要负责人的安全生产知识和管理能力培训证书供审阅。这个检查点判定“不符合”是因为企业没有获得安全管理人员和主要负责人的安全生产知识和管理能力培训证书。法规/行为准则：依据《中华人民共和国安全生产法》第24条，生产经营单位的主要负责人和安全生产管理人员必须具备与本单位所从事的生产经营活动相应的安全生产知识和管理能力。危险物品的生产、经营、储存单位以及矿山、金属冶炼、建筑施工、道路运输单位的主要负责人和安全生产管理人员，应当由主管的负有安全生产监督管理职责的部门对其安全生产知识和管理能力考核合格。考核不得收费。危险物品的生产、储存单位以及矿山、金属冶炼单位应当有注册安全工程师从事安全生产管理工作。</p>

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	
<p>7.17 During facility tour, auditor found that there was no needle guard equipped for all 20 sewing machines, there was no belt guard equipped for 2 out of 20 sewing machines. This checkpoint was rated as “No” due to the facility need to enhance machine safety system. Law/COC: In accordance with the National electrical equipment safety technical specification-GB19517-2009 2.3.3. Adequate measures shall be implemented to</p>	<p>7.17 在现场巡查时，审核员发现企业使用的所有20台针车没有安装挡针器，其中2台针车无皮带轮防护罩。这个检查点判定“不符合”是因为企业应在机器设备安全体系中提高自己的表现。法规行为准则：依据《国家电气设备安全技术规范》-GB19517-2009, 2.3.3, 应采取适当的措施，避免电气设备正常使用时接触或接近危险的运动部件，避免金属屑、粉尘的飞甩，避免液体、气体的溢出，避免外壳灼热或低温。</p>

Finding

prevent anyone from touching or getting close to dangerous moving parts while the electric equipment is in normal operation, to prevent metal scraps and dust from flying off, to prevent liquid and gas from overflowing, and to avoid extremely high or low temperature of the equipment's outside.