

# Monitoring summary report for Dongguan Prosub Technology Co., Ltd

## MONITORING ID: 25-0332524



Monitored Party <b>Dongguan Prosub Technology Co., Ltd</b>	amfori ID <b>156-063765-000</b>	Address <b>No. 2, Dalang Xinbao Second Street, Dalang Town, 523793 Dongguan, Guangdong Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>TUV Rheinland</b>
Monitoring Start Date <b>30/06/2025</b>	Closing Meeting Finished Date <b>30/06/2025</b>	Submission Date <b>07/07/2025</b>
Expiration Date <b>07/07/2026</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Dongguan Prosub Technology Co., Ltd</b>	Site amfori ID <b>156-063765-001</b>	

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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	<b>A</b>	
PA 8: No Child Labour	<b>A</b>	
PA 9: Special Protection for Young Workers	<b>A</b>	
PA 10: No Precarious Employment	<b>A</b>	
PA 11: No Bonded, Forced Labour or Human Trafficking	<b>A</b>	
PA 12: Protection of the Environment	<b>A</b>	
PA 13: Ethical Business Behaviour	<b>A</b>	

## GENERAL DESCRIPTION

Name of lead auditor: Lucas Huang; APSCA membership number: CSCA 21701891

Monitoring partner name: TUV Rheinland

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

Announcement Type: Semi-Announced

Business partner information: The auditee was located at No. 2, Dalang Xinbao Second Street, Dalang Town, Dongguan, Guangdong Province, China (中国广东省东莞市大朗镇大朗新宝二街2号). The auditee specialized in manufacturing of Phone protective case and its main production processes were molding, CNC, injection molding, painting, polishing and packing. No process was subcontracted. The auditee was established on January 16, 2014.

Audited location information: The facility only rented one 5-storey production building from the landlord as workshop, office and warehouse. The detail was as below: 1/F as injection molding, molding and CNC workshop, 2/F as packing workshop and office, 3/F and 4/F as warehouse, 5/F as painting, polishing and packing workshop. No other factory was in the same building. No transportation/canteen/dormitory was provided by the auditee.

Operating shifts and hours: regular working day was Monday to Friday, rest day was Saturday and Sunday. Most employees worked one shift: 8:00 to 12:00, 13:30 to 17:30, two shifts for injection molding workers: 8:00 to 12:00, 13:30 to 17:30 and 20:00 to 0:00, 1:30 to 5:30, overtime was arranged 1-2 hours per time. Attendance records from June 1, 2024 to June 30, 2025 were provided for review, 10 workers' attendance records in August 2024, March 2025 and May 2025 were sampled; maximum daily/weekly/monthly overtime was 2/18/84 hours respective in samples basing on provided records.

Time recording system: Fingerprint scan system.

Salary payment details: The local minimum wage was RMB2080 per month. The factory paid the employees with the wages in hourly rate- RMB11.95 per hour equal with RMB2080 per month. The wages in the current month were paid to the employees by bank at around 15th of the following month. The auditee paid 150%, 200% and 300% of normal rate to workers for overtime on normal working days, rest days and holidays.

Worker number information:

- Total worker number: 49
- Production worker number: male-24, female-17
- Vulnerable worker number: domestic migrant: male-22, female-21; foreign migrant: N/A, young: N/A, pregnant: N/A, season: N/A, temporary: N/A, disabled: N/A, home-based: N/A. • Any other special group workers: N/A

Good practices: N/A

Worker organization details: 2 worker representative was elected in 2025.

Circumstances: There was no special circumstance during the audit. The facility had good supporting to the audit.

Summary of findings: PA1: Insufficient management system in implement of amfori BSCI; ineffective production capacity evaluation leading excessive monthly overtime. PA2: workers not aware of basic amfori BSCI requirement. PA5: insufficient social insurance. PA6: Excessive monthly overtime. PA7: insufficient PPE management, insufficient occupational health check, no occupational hazard monitoring, chemicals without label, electrical safety inspection not conducted by qualified electrician, no guarding equipment for auto-robot polishing area. PA10: Not sign non-fixed term labor contract with relevant employees. PA12: Insufficient hazardous waste management, no waste air and noise monitoring, waste outlets without label.

Living wage calculation:

#LivingWage

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

Remark: 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. There was no agencies /contractor used by the auditee, which made the agency labor contract / contractor license /permit not applicable; There was no collective bargaining agreement signed between the auditee and workers; There was no government waiver (such as overtime waiver, social insurance waiver, etc.) applied for this auditee.

3. The facility fully moved from "东莞市大朗镇沙步村南门街18号 No.18, Nanmen Street,Shabu Village,Dalang Town, Dongguan" to current location since January 2025, the distance between each other was around 6km. The auditor also

visited the old location, which was used by another factory now.

## SITE DETAILS

Site  
**Dongguan Prosub Technology Co., Ltd**

Site amfori ID  
**156-063765-001**

### GICS Classification

Sector <b>Consumer Discretionary</b>	Industry Group <b>Consumer Durables &amp; Apparel</b>	Industry <b>Leisure Products</b>
Sub Industry <b>Leisure Products</b>		

### amfori Process Classifications

N.A.

### NACE Classification

N.A.

### GS1 Classifications

N.A.

### Water Stress Situation

N.A.

## METRICS

### Key Metrics

Total workforce	49	Workers
Legal minimum wage in local currency	2,080	Monthly
Lowest wage paid for regular work at the site	2,080	Monthly
Calculated living wage in local currency	3,275.44	Monthly
Total sample	10	Workers

### Other Metrics

Male workers	27	Workers
Female workers	22	Workers
Non-binary workers	0	Workers
Permanent workers - Male	27	Workers
Permanent workers - Female	22	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	13	Workers
Workers with night shift - Female	7	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	22	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	27	Workers
Workers hired directly - Female	22	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	5	Workers
Sample - Female	5	Workers
Sample - Non-binary	0	Workers

## FINDINGS

### PA1: Social Management System

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**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

The auditee partially respected this principle, because based on management and employee interviews, document reviews, onsite observation, the management knew about partial requirement of amfori BSCI Code of Conduct. The auditee had introduced the amfori BSCI Code of Conduct in the production activities, but findings for PA1, PA2, PA5, PA6, PA7, PA10 and PA12 still existed. The auditee had established the social responsibility management manual and procedures based on amfori BSCI principle and local legal requirement, such as the working hours control procedure, wages and benefit management procedure and occupational health and safety management procedure. However, the auditee did not respect and monitor the effective of management system, for example, how to monitor the workers working hours and how to monitor the occupational health and safety issues etc. This violated the requirement of amfori BSCI System Manual.

被审核方部分遵守该原则，因为基于管理人员和员工访谈，文件评审和现场观察，工厂管理了解部分 amfori BSCI 行为准则的要求，已经在其生产活动中导入 amfori BSCI 行为准则。但是涉及 PA1，PA2，PA5，PA6，PA7，PA10 和 PA12 仍存在问题。被审核方已经建立了基于 amfori BSCI 原则和当地法律法规的社会责任管理手册和程序文件，例如工作时间控制程序，工资福利程序和职业健康与安全管理程序。然而，被审核方未充分尊重和监控管理体系的有效性，例如，如何监控员工的工作时间，如何监控职业健康与安全的问题等。反了 amfori BSCI 系统手册中的要求。

**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

The auditee partially respected this principle, because based on management and employee interviews, document reviews, onsite observation, the auditee had prepared the production capacity planning for their production order and delivery time. However, the auditee did not consider the compliance of workers' overtime-working hours during the production capacity planning. The auditee did not hire enough employees or properly organized to meet the produce requirement. Checking with workers attendance from 01 June 2024 to audit day, 10 sampled workers' monthly

被审核方部分遵守该原则，因为基于管理人员和员工访谈，文件评审和现场观察，被审核方为生产订单和发货时间制定了产能规划。但是，被审核方在产能规划期间未考虑员工加班工作时间的合规性，被审核方未聘请足够的员工或更好地组织生产来满足生产的需求。根据检查员工 2024 年 6 月 1 日至审核当日的考勤记录，10 名抽样员工在过去一年月加班工作时间超过法规要求（见 6.2）。反了 amfori BSCI 系统手册中的要求。

### Finding

overtime working hours exceeded legal requirements in the past year. (Refer to 6.2). This violated the requirement of amfori BSCI System Manual.

## PA 2: Workers Involvement and Protection

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**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

The auditee partially respected this principle, because based on management and employee interviews, document reviews, 60% of interviewed workers did not know the basic requirement of amfori BSCI code of conduct, such as Workers Involvement and Protection, decent working time and so on. amfori BSCI CoC was posted on 1/F and the facility had provided CSR training to employees. The facility management stated that they would provide more training on amfori BSCI to employees. This violated the requirement of amfori BSCI System Manual.

被审核方部分遵守该原则，因为基于管理人员和员工访谈，文件评审，60%访谈员工不知道amfori BSCI的行为守则要求，例如员工参与和保护，体面的工作时间等。1楼有张贴amfori BSCI行为守则，工厂也有给员工提供社会责任方面的培训。工厂方面表示会给员工提供更多有关amfori BSCI的培训。违反了amfori BSCI系统手册中的要求。

## PA 5: Fair Remuneration

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**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

The auditee partially respected this principle, because based on management, workers interview and document review, insufficient social insurance was noted. There were 49 employees currently (1 retired worker and no employees hired within one month, thus total 48 employees should be provided with social insurance), as per records of social insurance system and provided duty paid proof of

被审核方部分遵守该原则，因为基于管理层、员工访谈、文件审查，发现社会保险覆盖不足。工厂目前有49名员工（1名退休年龄员工，近一个月无新入职员工，故应该为48名员工提供社保），根据2024年7月至2025年6月的社保系统的记录，48人中有9名没有购买养老，失业，医疗险（包含生育险）和工伤保险。根据管理人员和受访员工陈述，部分员工有参加新农合或新农保，但工厂未提供相关记录。工厂

### Finding

which from July 2024 to June 2025, 9 out of 48 employees were not covered by retirement insurance, unemployment insurance, medicine insurance (including child-bearing insurance) and work injury insurance. As per management and interviewed employee statement, some employees participated in the new rural cooperative medical system or new rural insurance, but the factory did not provide relevant records. The facility had provided commercial accident insurance for all workers who were not covered with social insurance, valid from September 11, 2024 to September 10, 2025. Reference law: Labor Law of the People's Republic of China, Article 72 and 73.

有给未参加社保的员工提供商业意外，有效期为2024年9月11日到2025年9月10日。参考法律法规：中华人民共和国劳动法第72及73条

## PA 6: Decent Working Hours

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**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 auditee did not respect this principle, because based on management, workers interview and document review, the time records from June 2024 to June 30, 2025 were provided for review. As per the management interview and document review, the corresponding overtime control system has not been established, leading excessive monthly overtime were detected for 10 out of 10 sampled employees in sampled month of August 2024, March 2025 and May 2025 with the maximum up to 84 hours, 82 hours and 68 hours respectively. As per the workers interview, they conducted overtime voluntarily and could get legal overtime compensation. The facility stated that they would suitably control the working overtime for the employees. Reference law: PRC Labor Law Article 41.

被审核方未遵守该原则，因为基于管理层、员工访谈、文件审查，2024年6月到2025年6月30日的考勤提供了查看。根据管理层访谈和文件查阅，被审核方并未建立相应的加班控制系统以致在抽样的2024年8月，2025年3月以及2025年5月中，10个抽样员工中有10名员工抽样月加班超时，最大分别达到84小时，82小时和68小时。根据员工访谈，加班是自愿的，并且有获得合法的加班补偿。工厂管理表示会适当控制员工加班。参考法规：中华人民共和国劳动法第41条。

## PA 7: Occupational Health and Safety

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**Question:** 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The auditee partially respected this principle, because based on management, workers interview and onsite observation, 1 polishing worker exposed to noisy environment were not wearing provided earplugs, and 2 molding workers were not wearing provided protective shoes. The facility management stated they would provide proper PPE to employees and train to use during working time. Reference law: Safety Law of the People's Republic of China, Article 42.

被审核方部分遵守该原则，因为基于管理层，员工访谈以及现场观察，1名打磨员工会接触明显的噪声，但未佩戴提供的耳塞，另2名模具部员工工作期间未穿戴提供的防护鞋。工厂表示会提供合适的防护用品给员工并教育员工工作期间使用。参考法律法规：中华人民共和国安全生产法第四十二条。

**Question:** 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The auditee partially respected this principle, because based on management, workers interview, document review and onsite observation: 1. there were dust and noise hazards in crushing position, chemical hazards at painting position, no occupational hazardous factor monitoring report could be provided for review. 2. The facility provided on-the-job occupational disease examination for workers involved in occupational hazard factors, but the factory did not provide pre-job and off-job occupational disease examination for relevant workers. 3. Around 50% paints containers in the workshops were not labelled based on site observation. Reference regulations: Article 20 of the Provisions on the Administration of Occupational Health in the Workplace - Article 35 of the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Regulation on chemical safe handling in workplace, Article 12

被审核方部分遵守该原则，因为基于管理层，员工访谈，文件审阅以及现场观察：1.工厂碎料工序存在粉尘、噪声危害因素，喷漆岗位存在化学品危害因素，工厂未能提供危害因素检测。2.工厂给涉及职业病危害因素的员工提供在岗职业病体检，但工厂没给相关员工提供岗前和离岗职业病体检。3.车间现场约50%的油漆容器没有标识。参考法规：《工作场所职业卫生管理规定》第20条&中华人民共和国职业病防治法第35条，工作场所安全使用化学品规定，第12条

**Question:** 7.13 Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?

**ENGLISH**

**LOCAL LANGUAGE**

### Finding

The auditee partially respected this principle, because based on management interview, onsite observation and document review, monthly electrical safety inspections were performed by office staff without relevant qualification. The facility stated they would arrange qualified electrician to conduct relevant inspection. Reference law: Provisions on the Administration of Safety Technology Training and Examination for Special Operation Personnel, article 5.

被审核方部分遵守该原则，因为基于管理人员访谈，现场观察和文件审阅，工厂每月进行的电气安全检查是由办公室人员进行的，没有相关的资质。工厂方面表示会安排电工进行相关检查。参考法规：特种作业人员安全技术培训考核管理规定 第5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 respected this principle, because based on management and employee interviews, onsite observation, 2 auto-robot polishing operation areas were missing needed guarding equipment, such as protective cover. Worker interviews confirmed that no work-related injuries had occurred since they established. Reference law: General rules for designing the production facilities in accordance with safety and health requirements(GB5083-2023), article 6.1.1

被审核方部分遵守该原则，因为基于管理人员和员工访谈，现场观察，2台自动打磨机器人作业区域缺少必要的防护装置，例如防护罩。对工人的访谈证实，自成立没有发生过工伤事故。参考法规：《生产设备安全卫生设计总则》（GB5083-2023）第6.1.1条

## PA 10: No Precarious Employment

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**Question:** 10.2 Is there satisfactory evidence that the auditee engages workers based on recognised and documented employment relationships?

### ENGLISH

### LOCAL LANGUAGE

### Finding

The auditee partially respected this principle, because based on management, workers interview and document review, the facility did not sign non-fixed term labor contracts with workers who worked over 10 years or had signed two continues fix term labor contracts. The facility stated they would discuss internally for this point. Reference law: Labor Contract Law of the People's Republic of China, article 14

被审核方部分遵守该原则，因为基于管理层，员工访谈和文件审阅，工厂未和连续工作满十年或连续签订2次固定期限劳动合同的员工签署无固定期限劳动合同。工厂表示针对此点会进行内部商讨。参考法规：《中华人民共和国劳动合同法》第十四条

## PA 12: Protection of the Environment

Site: Dongguan Prosub Technology Co., Ltd | Site amfori ID: 156-063765-001

**Question:** 12.4 Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?

### ENGLISH

### LOCAL LANGUAGE

#### Finding

The auditee partially respected this principle, because based on management, workers interview and onsite observation, the facility had set specialized hazardous waste warehouse with warning sign outside, but hazardous waste in it were missing label, secondary containment, and the roof of hazardous waste warehouse was broken, leaking stormwater. Wastewater collection tank was missing secondary containment and label. The facility stated that they would correct it.

Reference Law: Standard on Pollution Control of Hazardous Waste Storage (GB18597-2001), Article 6.3.9. 2. The facility did not provide waste air/noise monitoring report for review. Reference law: Measures for the Administration of Environmental Surveillance, article 21. 3. Waste air outlets were missing label. Reference law: Technical Requirements for Standardized Remediation of Sewage Discharge Ports, article 4.1

被审核方部分遵守该原则，因为基于管理层，员工访谈以及现场观察：1. 工厂有专门的危废仓库且仓库外有警示标识，但里面的危废缺少标识以及二次容器，且危废仓库屋顶破损，漏雨水。零星废水收集桶缺少标识和二次容器。工厂方面表示会进行改善。参考法律法规：危险废弃物贮存污染控制标准（GB18597-2001）第6.3.9条 2. 工厂未能提供废气和噪声检测报告查看。参考法规：《环境监测管理办法》第二十一条。3. 废气排口未缺少标识。参考法规：《排污口规范化整治技术要求》第4.1条