



## AUDIT SUMMARY OF CONTENT



### FACTORY



Social audit



#### FACTORY NAME

Circle Dot Shenzhen Co. Ltd



#### LOCATION

China, Shenzhen



#### GPS COORDINATES

Lat.: 22.54554 | Long.: 114.0683



#### NUMBER OF EMPLOYEES

103



#### TIER

Tier 1 - Finished prod. assembly

Public on  
Sustainability  
Map



## ICS PRESENTATION

The ICS is a retailer-led international multi-stakeholders initiative providing due diligence standards to correct risk of violation to **human and environmental rights in world supply chains**. ICS members apply a common standard built upon, but not limited to UN, OECD, ILO and local regulations.

To engage into membership:  
contact@ics-asso.org

## ICS ETHICAL POLICY

ICS methodology is based on the independence between audit firms and audited factories. ICS habilitated audit firms and audit dates are decided by ICS members only, who commission and own the audit reports, according to ICS guidelines and under ICS monitoring. ICS is not funded by audit firms. Full audit reports are accessible to ICS members only.

## AUDIT RESULTS



#### AUDIT CYCLE:



Initial ☒



Follow-up ☐



Reaudit ☐

AUDIT DATE: 24 | 03 | 25

AUDIT DURATION: 1 manday

AUDITING BODY: SGS



#### FULL COMPLIANCE DATA SET



FACTORY  
PROFILE



CHECKLISTS



AUDIT  
HISTORY



ONGOING CORRECTIVE  
ACTION PLAN



RATE OF  
PROGRESS

An audit alone does not constitute a complete due diligence process.  
Log in to the ICS database or join ICS for a comprehensive assessment.

## DETAILS NOTE BY CHAPTER

0 | Management System, Transparency and Traceability

A B C D E

100 %

1 | Minimum age, Child labour and Young workers

A B C D E

100 %

2 | Forced labour

A B C D E

100 %

3 | Discrimination

A B C D E

100 %

4 | Disciplinary Practices, Harassment and Abuse

A B C D E

100 %

5 | Freedom of association and Grievance Mechanisms

A B C D E

100 %

6 | Working hours and Overtime

A B C D E

50 %

7 | Remuneration and Benefits

A B C D E

100 %

8 | Health and Safety

A B C D E

95 %

Please note that this document is not a certificate. It should be used for communication and reporting purpose only.

SOURCING  
ROTORION

Sourcing & Création

Requests on interpretations, clarifications and recommendations should be addressed to the ICS team via the ICS [contact@ics-asso.org](mailto:contact@ics-asso.org) email address, for ultimate share with the ICS members.

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PARIS · [ics-asso.org](http://ics-asso.org)

## THE FACTORY IS NON COMPLIANT OR PARTIALLY COMPLIANT TO THE FOLLOWING REQUIREMENTS

### 6 | Working hours and Overtime

#### Working hours and Overtime

- 6.6 Are workers working overtime hours (daily, weekly, monthly, yearly, other) in accordance with local law?  
| 工厂同意此问题点并将采取必要措施进行改正。
- 6.7 Are workers working overtime in compliance with ILO standards?  
| 工厂同意此问题点并将采取必要措施进行改正。

### 8 | Health and Safety

#### Health and Safety Trainings

- 8.23 Does the facility conduct fire drills on a regular basis (if not defined by law, at least once per year) for all floors and shifts?  
| 工厂同意此问题点并将采取必要措施进行改正。

#### Emergency Paths and Exits

- 8.44 Do emergency exit stairs have handrails or guards and are in compliance with local law?  
| 工厂同意此问题点并将采取必要措施进行改正。

#### Hazardous, Flammable or Combustible Materials

- 8.88 Is there an eye wash station located within 6 meters of the chemical storage area and connected to a water source?  
| 工厂同意此问题点并将采取必要措施进行改正。

# THE FACTORY IS COMPLIANT TO THE FOLLOWING REQUIREMENTS

## o | Management System, Transparency and Traceability

### Management System, Transparency and Traceability

- 0.1 Have all of the reviewed documents been found free from any manipulation or falsification?
- 0.3 Have requested documents been provided for review?
- 0.4 Have requested documents been found valid?
- 0.5 Has the factory set up a mechanism to remain up-to-date with applicable and related social compliance legal requirements?
- 0.6 Is a person of the management designated to coordinate social compliance in the factory?
- 0.7 Has the factory documented its objectives, targets and action plan to address the main social impacts?
- 0.8 Has the facility established policies in the areas of child labour, forced labour, discrimination, disciplinary practices, harassment, abuse, freedom of association, work hours and overtime, remuneration and benefits, health and safety and anti-bribery?
- 0.9 Does the facility have a documented system to annually review and modify facility's policies?
- 0.10 Are legally required labour-related notices clearly posted throughout the factory in language(s) understood by concerned workers?
- 0.11 Does the facility train workers and contractors on the facility's policies and legal requirements in the areas of labour and health and safety?
- 0.12 Does the facility have management personnel to implement the facility's policies and legal requirements in the areas of labour and health and safety?
- 0.13 Does the facility have documented policies and procedures defining how to manage bribery or business ethics related cases and risks?
- 0.14 Does the facility conduct regular trainings in relation to anti-bribery and business ethics?
- 0.15 Has the factory implemented a mechanism to remain up-to-date with applicable chemicals and industrial processes legal restrictions?

### Hiring and Termination

- 0.16 Are workers aware of their employment terms ?
- 0.17 Does the factory provide workers with a written document that outlines the employment terms in accordance with local law?
- 0.18 Is the written document that outlines the employment terms in a language understood by each respective worker?
- 0.22 Are worker probation periods in accordance with local law?
- 0.23 Does the factory maintain documentation that indicates workers' eligibility to work in accordance with local law?
- 0.24 Is termination of employment executed in accordance with local law?
- 0.25 Does the facility maintain termination records?

### Supply Chain

- 0.27 Do the statements provided by the factory in the "products and the production processes" and "raw materials and components suppliers" section of the Factory profile seem to be accurate and reflect the reality observed during the factory visit?
- 0.28 Does the factory evaluate defined standards for suppliers (e.g. service providers, contractors, raw material suppliers), that prescribe expected levels of social performance, and assess their concrete implementation?
- 0.45 Are labor contracts of migrant workers in accordance with local law?

## 1 | Minimum age, Child labour and Young workers

### Minimum age and Child labour

- 1.1 Does the facility currently employ only workers above the age of 15 or the legal working age?
- 1.2 Did the factory always employ workers above the age of 15 or the legal working age at the time of hiring?
- 1.3 Is the facility free from non-working children (under the age of 15 or legal working age)?
- 1.5 Does the facility request legal documentation to verify worker's age at the time of hire?
- 1.6 Does the facility keep copies of legal documentation to verify worker's age?

## 2 | Forced labour

### Forced labour

- 2.1 Is there objective evidence that factory does not retain any document (e.g. passport, work permit, birth certification, official ID card, driver's licence) without written agreement and without the possibility to recover them?
- 2.2 Does the facility avoid withholding wages during the employment relationship?
- 2.3 Are workers free of any cost associated with worker recruitment and placement?
- 2.4 Are workers guaranteed freedom of movement during working hours?
- 2.5 Are workers guaranteed freedom of movement after working hours?
- 2.6 Are workers free from daily production quota requirements prior to leaving the facility?
- 2.7 Is overtime voluntary?
- 2.8 Are workers informed about and understand overtime obligations prior to employment and prior to working the overtime shift?
- 2.9 Are workers free to resign from their current employment in accordance with local law?
- 2.16 Is the facility free from any other form of forced labour that would not be addressed by the other questions of the audit?
- 2.17 Is the facility free from any form of forced or bonded labour (including one or more of the above listed forms) for any holder/management/workers' family members?

## 3 | Discrimination

### Discrimination

- 3.1 Are workers free from discrimination in terms of hiring, compensation, access to training, promotion, termination, or retirement?
- 3.2 Does the facility maintain procedures to prohibit and prevent discriminatory practices?
- 3.3 Are workers hired and maintained in employment regardless of pregnancy status?
- 3.4 Does the facility follow provisions on women's employment terms during pregnancy, maternity leave and return from maternity leave in accordance with local law?
- 3.5 Do workers have equal opportunities to work overtime in accordance with local law?

## 4 | Disciplinary Practices, Harassment and Abuse

### Disciplinary Practices, Harassment and Abuse

- 4.1 Are workers free from any form of harassment, mental, physical and/or verbal abuse, and corporal punishment?
- 4.2 Are disciplinary measures implemented by the facility legal and non excessive?
- 4.3 Does the disciplinary procedure comply with local law?
- 4.4 Does management staff receive training on implementing disciplinary procedures?
- 4.5 Does the facility keep records of implemented disciplinary actions?
- 4.6 Are facility's security practices non abusive?

## 5 | Freedom of association and Grievance Mechanisms

### Freedom of association

- 5.1 Are workers free to associate and collectively bargain?
- 5.3 Where the ability to associate and collectively bargain are legally restricted, do workers have access to alternative means?
- 5.5 Are worker representatives elected without interference by the factory and as required by law?
- 5.6 Are there regular meetings between worker representatives and management as required by law?
- 5.7 Are the meetings' minutes recorded and communicated to the workers?
- 5.8 Are workers free from discrimination on the basis of trade union affiliation or non-affiliation in terms of hiring, compensation, access to training, promotion, termination, or retirement ?

### Grievance Mechanism

- 5.9 Does the factory have a procedure by which workers can freely and confidentially raise grievances to management?
- 5.10 Does the factory record and track reported grievances?

- 5.11 Does the factory communicate the grievance review progress to workers and individuals responsible for reviewing reported grievances?

## 6 | Working hours and Overtime

### Working hours and Overtime

- 6.1 Are workers working regular working hours (daily, weekly, monthly, yearly, other) in accordance with local law?
- 6.2 Are workers working regular hours in compliance with ILO standards?
- 6.3 Does the facility maintain time records (e.g. time cards)?
- 6.4 Are time records accurate?
- 6.5 Are overtime hours tracked separately?
- 6.12 Do workers receive days off according to the local law?
- 6.13 Do workers receive at least 1 day off (24 consecutive hours) within 7 days period according to the ILO convention ?

## 7 | Remuneration and Benefits

### Remuneration

- 7.1 Is the legal minimum wage guaranteed to workers in accordance with local law?
- 7.2 Does the facility maintain payroll records?
- 7.3 Are payroll records maintained in accordance with local law?
- 7.4 Is the payment method in accordance with local law?
- 7.5 Is the time and frequency of payment in accordance with local law?
- 7.8 Are new workers during probation period paid wages in accordance with local law?
- 7.9 Does the facility provide workers with an understandable wage slip that, at minimum, include regular and overtime hours worked, regular and overtime pay, and deductions in accordance with local law?
- 7.10 Are workers paid for "down time" in accordance with local law?

### Overtime remuneration

- 7.13 Is overtime paid?
- 7.14 Is overtime paid at a legal premium rate?

### Benefits

- 7.17 Do workers receive benefits and allowances in accordance with local law?
- 7.18 Are workers covered by the legal social insurances?
- 7.20 Are leaves and public holidays paid in accordance with local law?
- 7.21 Is parental leave paid in accordance with local law?
- 7.22 Do workers receive additional remuneration (e.g., bonuses, incentives) in accordance with local law?

### Deductions

- 7.23 Are deductions in compliance with local law ?

## 8 | Health and Safety

### Building Structure

- 8.1 Does the facility have non-expired documentation of compliance with building safety requirements issued by local authority in accordance with local law? (Date of building's construction (Date format required : DD/MM/YYYY) / Province / Auditor's comments)
- 8.2 Does the facility have non-expired fire safety documentation issued by the local fire authority in accordance with local law?
- 8.3 Does the facility operate in a building matching the authorized purpose?
- 8.4 Are the buildings where hazardous materials are stored or hazardous work is conducted free of residential accommodations?
- 8.5 Based on observation, is the facility free from any visible crack on the walls, on any building or premises ?
- 8.6 Does the number of floors in the existing building match with the original number of floors on the building plan or certificate ?

- 8.7 Does the facility have documentation of safety inspections for the building and the machineries issued by any third-party (government and/or private third-party) in accordance with local law?

### Facility management

- 8.9 Does the facility conduct a risk assessment at least once per year to identify health and safety risks that include fire safety?
- 8.10 Does the facility record and track preventive or corrective action in response to risk assessments?
- 8.11 Does the facility have a Health and Safety Committee that addresses safety of machinery/ equipment; personal protective equipment (PPE); hazardous, flammable and combustible materials; and fire safety?
- 8.12 Is the health and safety committee comprised of management and worker representatives?
- 8.13 Does the Health and Safety Committee meet periodically?
- 8.14 Are Health and Safety Committee meetings documented?
- 8.15 Does the facility conduct internal inspections/ audits for health and safety?
- 8.16 Does the facility provide occupational health check-ups according to local law?

### Health and Safety Trainings

- 8.17 Does the facility conduct health and safety training for new workers?
- 8.18 Does the facility conduct health and safety training for existing workers?
- 8.19 Are health and safety trainings documented?
- 8.20 Does health and safety training include, at minimum: general workplace safety, fire safety, evacuation procedures, handling and maintenance of machinery and equipment, handling of hazardous, flammable and combustible materials (where applicable), use of PPE and accident prevention?
- 8.21 Does the facility have trained fire team?
- 8.22 Is emergency response personnel trained, at minimum, on: notification of workers in event of fire or emergency, reporting fire or emergency to local authority, use of fire extinguishers, evacuation procedures, and first aid?
- 8.24 Are fire drills documented with, at minimum: date, announced/ unannounced, number of participants, and time it took to evacuate? Date format required : DD/MM/YYYY

### Accident and Emergency Plans and Procedures

- 8.25 Does the facility document occurrence and cause of workplace accidents and diseases?
- 8.26 Does the facility report workplace accidents and diseases to local authorities?
- 8.27 Does the facility post emergency contact information on every floor?
- 8.28 Is there an evacuation plot plan posted on every floor of the facility?
- 8.29 Is the evacuation plot plan in a language understood by workers?
- 8.30 Can fire department vehicles and fire fighters access the facility?

### Emergency Paths and Exits

- 8.31 Are there at least two emergency exits on every floor of the facility?
- 8.33 Are emergency exits located on each side of the working area?
- 8.34 If the facility is located above the ground floor or occupies multiple floors, are there at least two sets of stairs to use as emergency exit paths?
- 8.36 Are emergency exit paths designated with visible path markings?
- 8.37 Are emergency exit paths accessible and unobstructed?
- 8.39 Are emergency exits designated with visible signs?
- 8.40 Are emergency exits unobstructed and unlocked?
- 8.41 Do emergency exit doors comply with local requirements?
- 8.45 Is emergency lighting and all emergency equipment connected to a secondary power source?
- 8.46 Do emergency paths lead towards emergency exits and therefore away from the building?
- 8.47 Is the assembly point or public way unobstructed and located away from the facility?

### Fire Equipment

- 8.49 Is there a fire alarm present at the facility?
- 8.50 If there is a manual fire alarm present at the facility, is it designated or clearly visible?
- 8.51 If there is a manual fire alarm, is it unobstructed?
- 8.53 If there is a fire alarm, is it audible and different from lunch/ break bell?



- 8.54 If the factory is located in a shared building, do other factories in the building have fire alarms?
- 8.55 If there are alarms present in the shared building, are these alarms interconnected?
- 8.56 Does the facility have notification lighting in areas where noise levels are above ambient?
- 8.57 Has the factory put fire detection measures in place where hazardous waste are stored?
- 8.58 Are there fire extinguishers on every floor of the facility?
- 8.59 Are fire extinguishers present along emergency exit path?
- 8.60 Are fire extinguishers designated, clearly visible and accessible?
- 8.61 Do fire extinguishers comply with legal requirements?
- 8.62 Are fire extinguishers inspected by facility personnel according to local law?
- 8.63 Are fire extinguishers inspected by specialized companies on a regular basis (if not defined by law, at least once per year)?
- 8.64 Are fire extinguishers adapted to products used and stored installed within reasonable distance?
- 8.65 Are there smoke or fire detectors in the factory according to local law?
- 8.66 If there are smoke detectors or fire detectors present at the facility, does the facility conduct their inspections every month and legally required inspections?
- 8.67 Are there fully functional fire hydrants or sprinklers or hose pipes in the facility according to local law?
- 8.68 If there is a fire hydrant, a sprinkler system, hose pipes or any other equipment in place at the facility, is it inspected, tested and maintained every three months and according to legally required inspections (confirming they are in good working order)?
- 8.69 Can facility management point to a water source, be it private or municipal, that supplies water for fire hydrant, hose pipe or sprinkler system?

### Electrical Equipment

- 8.70 Are electrical panels, wires and outlets protected?
- 8.71 Are electrical panels labelled?
- 8.72 Are electrical panels, wires and outlets inspected regularly by certified staff (if not defined by law, at least once per year)?

### Production Machinery

- 8.74 Are production and process equipment as well as machinery safe to use?
- 8.75 Do all production and process machinery have an emergency switch off button and easily accessible?

### Hazardous, Flammable or Combustible Materials

- 8.76 Are materials labeled as hazardous, flammable or combustible stored away from sources of ignition?
- 8.77 Are materials labelled as hazardous, flammable or combustible stored in a separated dedicated storage closed off area(s) away from production area?
- 8.78 Does the facility maintain a Material Safety Data Sheet (MSDS) in a language understood by workers, available and accessible to all workers close to the areas where chemicals are used and stored?
- 8.79 Are workers working with materials labeled hazardous, flammable or combustible familiar with the Material Safety Data Sheet (MSDS) at the facility?
- 8.80 Are all the chemical containers labelled with the name in local language and the corresponding hazard symbol (for hazardous chemicals)?
- 8.81 Does the factory maintain a reliable and complete chemical inventory with the following basic information: area of use, chemical name, CAS Numbers of the chemical components, chemical supplier, MSDS availability and quantities stored?
- 8.82 Does the facility maintain an inventory of the waste types and quantities generated on-site?
- 8.83 Does the facility separate hazardous wastes from non-hazardous waste streams?
- 8.84 According to the local regulation for waste (including sludge) handling, storage, treatment or disposal, is a waste management procedure in place for waste collection and temporary storage?
- 8.85 Does the facility make sure that the workers who handle wastes are aware and are trained to the requirements on waste management (segregation, storage, labelling and disposal)?
- 8.87 In case of hazardous, flammable or combustible materials use, is the eye wash station accessible and unobstructed?
- 8.89 Is the factory free from any legally prohibited chemicals?
- 8.90 Is the factory free from any legally prohibited production process that would currently be in use?

### Personal protective equipment

- 8.91 Where necessary, do workers have access to personal protective equipment (PPE) free of charge?
- 8.92 Is use of personal protective equipment (PPE) required and enforced by facility management?

### **Sanitation**

- 8.97 Do workers have access to gender-specific, clean and private toilet facilities?
- 8.98 Are all washing and toilet areas equipped with soap?
- 8.99 Do toilet facilities have washing installations with running water?
- 8.100 Do workers have a free access to potable water?

### **Medical care and Ergonomics**

- 8.102 Is there a valid first aid kit present in every working area?
- 8.104 Does the facility have a signed agreement with an emergency unit in the vicinity of the facility in case of a serious accident?
- 8.105 Does the facility have sufficient trained workers to administer medical care?
- 8.107 Is the workplace and working conditions ergonomic according to local law?

### **Transportation**

- 8.110 Does the facility ensure transport and traffic safety across the workplace ?