

Monitored Party <b>Dongguan Emilux Lighting Technology Limited</b>	amfori ID <b>156-067099-000</b>	Address <b>Room 303, Building 1#, No. 1, Guanhuang North Road, Gaobu Town, 523873 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>15/12/2025</b>	Closing Meeting Finished Date <b>15/12/2025</b>	Submission Date <b>22/12/2025</b>
Expiration Date <b>22/12/2026</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Dongguan Emilux Lighting Technology Limited</b>	Site amfori ID <b>156-067099-001</b>	

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	<b>C</b>	
PA 2: Workers Involvement and Protection	<b>A</b>	
PA 3: The Rights of Freedom of Association and Collective Bargaining	<b>A</b>	
PA 4: No Discrimination, Violence or Harassment	<b>A</b>	
PA 5: Fair Remuneration	<b>B</b>	

PA 6: Decent Working Hours	<b>D</b>	
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: Ruby Ouyang; APSCA membership number: CSCA 21702073

Monitoring partner name: TUV Rheinland

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

Audit start and end time: start time: 8:30, end time: 17:30.

Announcement Type: Semi Announced

### Business partner information:

The auditee was located at Room 303, Building 1#, No. 1, Guanhuang North Road, Gaobu Town, Dongguan City, Guangdong Province, China, (广东省东莞市高埗镇莞潢北路1号1号楼303室). The auditee was established in 2020. The auditee specialized in manufacturing of Downlights, Spotlights, Track lights, and its main production processes were assembly, inspection and packing.

### Audited location information:

The auditee only rented and used part of 1F and whole 3F of one 3-storey building as production site, warehouse and office area, the part of 1F was used as showroom, the 3F was used as workshop, warehouse and office area. The rest areas of the same building and other buildings in the same yard were rented and used by other several factories manufacturing food and plastic products, etc. Based on onsite observation, management and workers interview, there was no shared workers or shared workshops. No business relationship was available among them. Therefore, only the used area of the auditee was covered in this audit. Total building areas of the auditee covered about 4650 square meters.

### Operating shifts and hours:

The normal working hours were 8 hours per day and 40 hours per week. Normal working days were from Monday to Friday. All employees were arranged in 1 shift: office staff worked as 8:30-12:00, 13:30-18:00, production workers worked as 8:00-12:00, 13:30-17:30, workers took the OT work voluntary, workers may have 1-2 hours overtime on weekdays: 18:00-20:00, and worked 8 hours overtime on Saturdays. However, no overtime was arranged on Sundays. At least one day off in every seven days were guaranteed. The time records from November 2024 to 15 December 2025 were provided for review, 10 workers were randomly selected from various sections for working time analysis within May 2025, July 2025 and October 2025, the maximum overtime was 2 hours per day, 17 hours overtime per week, 61 hours overtime per month.

### Time recording system:

The auditee used fingerprint scan attendance machine to record each time IN / OUT.

### Salary payment details:

Workers' wages were paid in cash on or before 25th of each month for last month's wage. The payroll from November 2024 to October 2025 was reviewed during this audit, 10 workers were randomly selected from various sections for wage analysis within May 2025, July 2025 and October 2025. Workers' wages were calculated by hourly rate. The minimum wage for workers was at least RMB11.95 per hour, which was in line with the local minimum wage standard: RMB1900 per month (equal to RMB 10.92 per hour) before March 2025, and RMB2080 per month (equal to RMB11.95 per hour) since March 2025. The wage was including normal wage, overtime wage, holiday wage, performance and full attendance bonus, deduction for social insurance. And 150%, 200% and 300% of normal rate would be compensated for overtime on normal working days, weekends and statutory holidays.

### Worker number information:

- Total worker number: 46
- Production worker number: 25 (male 17 and female 8)
- Domestic migrant workers number: 35 (male 19 and female 16)
- No young workers, child workers, disabled workers, breastfeeding employees, pregnant women employees
- No other special group workers (interns, apprentices, contractor workers etc.)

Good practices: Nil.

#### Worker organization details:

No union was established. Three worker representatives were elected by workers in May 2025.

#### Circumstances:

The auditee management provided full support to the auditor so that the audit was carried out in good co-operation status. During the closing meeting, both the compliance parts and non-compliance parts were communicated among the management and worker representative. The management agreed the non-compliances and stated that they would take immediate actions. There was no special circumstance during the audit.

#### Summary of findings:

PA1: The social compliance system was not perfect enough. The auditee did not arrange production plan properly.

PA2: Insufficient long-term goals.

PA5: Insufficient social insurance.

PA6: Workers' monthly overtime hours exceeded legal requirement.

PA7: Insufficient injury insurance; not provide the training records / certificate of safety production knowledge and management skill of the principal in charge and persons for the management of work safety; the completion acceptance report of the used building was not provided for review.

#### #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, No photos of agency labor contract, contractor license, government waiver and CBA (collective bargaining agreements) were taken, as no agencies or contractor were used, no government waiver was obtained, and no CBA were available.
- 2, 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.

SITE DETAILS

Site

Dongguan Emilux Lighting Technology Limited

Site amfori ID

156-067099-001

GICS Classification

Sector	Industry Group	Industry
Industrials	Capital Goods	Electrical Equipment
Sub Industry		
Electrical Components & Equipment		

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

## METRICS

### Key Metrics

Total workforce	46	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	21	Workers
Female workers	25	Workers
Non-binary workers	0	Workers
Permanent workers - Male	21	Workers
Permanent workers - Female	25	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	3	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	19	Workers
Domestic migrant workers - Female	16	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	21	Workers
Workers hired directly - Female	25	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 Emilux Lighting Technology Limited | Site amfori ID: 156-067099-001

**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 adhered to this principle because based on document review, on-site observation, management interviews, and employee interviews, the auditee established a social responsibility management system. It was found deviations in PA2, PA5, PA6, PA7 during this audit, e.g. overtime in excess of the regulatory allowances and inadequate health and safety management, etc. According to the management, they will improve it gradually. Refer to the requirements in the amfori BSCI system manual.

被审核方部分遵守该原则，因为基于文件查阅，现场观察、管理层访谈和员工访谈，被审核方建立了社会责任管理体系。被审核方在此次审核中，在PA2, PA5, PA6, PA7发现偏差，例如：超过法规允许的加班和不完善的健康安全管理等。管理层称他们会逐步改善。参考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 adhered to this principle because base on document review, management interviews, and employee interviews, the auditee established a capacity planning program; however, the auditee did not adequately consider overtime compliance when scheduling production, and the monthly overtime of production workers exceeded the limit permitted by the regulations. Management stated that based on production costs and order lead times, it is currently difficult to fully comply with the regulatory requirements for overtime. Refer to the requirements in the amfori BSCI system manual.

被审核方部分遵守该原则，因为基于文件查阅，管理层访谈和员工访谈，被审核方建立了产能规划程序，但是被审核方在安排生产时，没有充分考虑加班时间的符合性，生产工人的月加班超过法规允许的限值。管理层称基于生产成本及订单的交期考虑，目前加班时间难以完全符合法规要求。参考amfori BSCI系统手册中的要求。

### PA 2: Workers Involvement and Protection

Site: Dongguan Emilux Lighting Technology Limited | Site amfori ID: 156-067099-001

**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
<b>Finding</b>	
The auditee partially respected this principle because per document review and management/ workers interview, the auditee established long-term goals to protect workers according to the amfori BSCI values and principles. However, the auditee did not establish the action plan to achieve these goals. The management said that they will formulate corresponding plans in the future. refer to the requirements of the amfori BSCI system manual.	被审核方部分遵守该原则，因为根据文件审核和管理层和工人访谈，被审核方基于amfori BSCI的价值和意愿建立了长期目标来保护工人，但是工厂没有建立行动计划来实现这些目标。管理层表示后续会制定相应的计划。参考amfori BSCI系统手册中的要求。

## PA 5: Fair Remuneration

Site: Dongguan Emilux Lighting Technology Limited | Site amfori ID: 156-067099-001

**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
<b>Finding</b>	
The auditee did not respect this principle because based on interviews with management and workers, and social insurance records review, insufficient social insurance was detected. The factory has 46 employees, of which there were 1 retired employee, 3 workers joined in the factory less than one month. As per the latest social insurance record of Nov. 2025, the factory did not purchase retirement, medical, maternity, unemployment, and work-related injury insurance for 11 out of 42 employees who should purchase social insurance. The factory management and interviewed employees stated that these employees had purchased rural insurance in their hometown and did not want to purchase social insurance. But the factory did not collect rural insurance information. Reference law: Article 10, 23, 33, 44, and 53 of the Social Insurance Law of the People's Republic of China.	被审核方未遵守该原则，因为基于管理层和工人访谈和社保记录查看，社保购买不足。工厂有46名员工，其中包含1名退休返聘员工，3名入职未满一个月的员工。根据最近2025年11月社保记录，工厂没有给42名应购买社保员工中11名员工购买养老、医疗、生育、失业和工伤保险。工厂管理和受访员工表示这些员工在家乡购买了农村保险，不想购买社会保险。但工厂没有收集农村保险信息。参考法规：《中华人民共和国社会保险法》，第10、23、33、44和53条。

## PA 6: Decent Working Hours

Site: Dongguan Emilux Lighting Technology Limited | Site amfori ID: 156-067099-001

**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. Based on management interview, worker interview, worker representative interview and attendance records, it was identified that, employees' monthly overtime exceeded regulatory requirements. The auditee provided the attendance records from 01 November 2024 to the audit day, the auditor randomly sampled and checked 3 months' attendance records of 10 employees', and found that all sampled employees' monthly overtime in October 2025 exceeded 36 hours with a maximum monthly overtime of 55 hours; all sampled employees' monthly overtime in July 2025 exceeded 36 hours with a maximum monthly overtime of 61 hours; all sampled employees' monthly overtime in May 2025 exceeded 36 hours with a maximum monthly overtime of 57.5 hours. The maximum monthly overtime in December 2025 (as of the audit date) was 30 hours. (Reference law: Labor Law of the P.R.C, Article 41) Note: The management confirmed that the attendance system did not have overtime timeout warning function, and overtime arrangement was based on the order delivery date. Worker interview confirmed that they voluntarily worked overtime, and they are willing to earn higher income through overtime.

被审核方未遵守该原则。基于管理层访谈，工人，工人代表访谈和考勤记录，发现员工月加班超过法规要求。被审核方提供了自2024年11月1日到审核当天的考勤，审核员随机抽查了10名员工3个月考勤，发现所有抽样员工在2025年10月的月加班超过36小时，最大月加班是55小时；所有抽样员工在2025年7月的月加班超过36小时，最大月加班是61小时；所有抽样员工在2025年5月的月加班超过36小时，最大月加班是57.5小时。2025年12月（截止到审核当天）的最大月加班时间是30小时。（参考法律法规：《中华人民共和国劳动法》第41条）备注：管理层确认考勤系统没有加班超时预警功能，加班安排是根据订单出货期。员工访谈确认他们/她们自愿加班，愿意通过加班获取更高的收入。

**PA 7: Occupational Health and Safety**

Site: Dongguan Emilux Lighting Technology Limited | Site amfori ID: 156-067099-001

**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 because per document review and management/workers interview, it was noted that 15 out of 46 employees were not provided with accident insurance or commercial accident insurance as supplement. The management said they would provide commercial accident insurance for all

被审核方部分遵守该原则，因为根据文件审核和管理层和工人访谈，工厂46名员工中有15人没有参加工伤保险或者商业意外险作为补充。管理层表示将来会为所有没有工伤险的员工提供商业意外险。员工表示过去没有发生过工伤事故。参考法规：中华人民共和国社会保险法，第33条

### Finding

employees without accident insurance in the future. Employees said there was no work accidents in the past. Reference law: Social Insurance Law of the People's Republic of China, Article 33.

**Question:** 7.5 Is there satisfactory evidence that the auditee regularly provides OHS trainings to ensure workers understand the rules of work, personal protection and measures for preventing and reacting to injury to themselves and fellow workers?

### ENGLISH

### LOCAL LANGUAGE

### Finding

The auditee partially respected this principle because per management and document review, The auditee did not provide the training records / certificate of safety production knowledge and management skill of the principal in charge and persons for the management of work safety for review. The management said that they will arrange relevant personnel to attend training in the future. Reference law: Work Safety Law of the People's Republic of China (2021), Article 24.

被审核方部分遵守该原则，因为根据管理层访谈和文件审核，被审核方没有提供该企业负责人和安全管理 人员的安全生产知识和管理能力培训记录/证书供审阅。管理层表示后续会安排相关人员参加培训。参考法规：《中华人民共和国安全生产法》（2021）第24条。

**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

The auditee partially respected this principle because per document review and management interview, the auditee used partial areas of 1F and whole 3F of one 3-storey production building, the used building area was about 4150 square meters. Based on onsite observation, the buildings are well maintained, without cracks and subsidence observed. The building was completed around 2004, but the completion acceptance report of the building was not provided for review, the management stated that the landlord did not provide this document for them. Reference law: Construction Law of the People's Republic of China, Article 61

被审核方部分遵守该原则，因为根据现场观察，文件审核和管理层访谈，被审核方使用一栋3层生产楼的部分1楼及3楼整层，使用的建筑面积约为4150平米，现场观察建筑维护良好，无裂缝，无下沉，建筑在2004年左右竣工，但未提供这栋建筑的竣工验收报告供查看，管理层访谈表示房东没有提供该文件给他们。参考法规：中华人民共和国建筑法第61条