

Monitored Party Ningbo Tianqi Industrial Co.,Ltd	amfori ID 156-009755-000	Address No.21st, JinGang Road, Liyang Town, Ninghai, 315602 Ningbo, Zhejiang Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner SGS
Monitoring Start Date 25/04/2025	Closing Meeting Finished Date 25/04/2025	Submission Date 30/04/2025
Expiration Date 30/04/2026	Announcement Type Semi Announced	
Site Ningbo Tianqi Industrial Co.,Ltd	Site amfori ID 156-009755-001	

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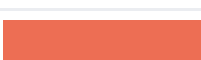

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OVERALL RATING



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	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: Marcus Xu; APSCA membership number (CSCA 21701702);

Name of team auditor (if applicable): Nil;

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

Monitoring partner name: SGS (Monitoring firm APSCA #: 11600006);

Audit schedule details: The audit was planned for 1 auditor x 1 day. The full audit (semi announced) was conducted on Apr. 25, 2025.

Business partner information: Ningbo Tianqi Industrial Co.,Ltd (宁波天祺实业有限公司) was located at No.21st, JinGang Road, Liyang Town, Ninghai, Ningbo, Zhejiang Province, China (中国浙江省宁波市宁海县力洋镇金港路21号). The factory name and address in the business license were the same as above. The business license number was 913302265511423553. The factory was established on Apr. 16, 2010. The business term of the factory was from Apr. 16, 2010 to Apr. 15, 2060.

The factory mainly manufactured plastic bottle, plastic box and various household products. The main manufacturing processes were plastic injection, heat transfer printing, assembly and packing. The annual production volume were 80,000,000 pcs.

Audited location information: The factory used the 1st floor of one 4-storey building, the 1st floor, parts of the area of the 2nd floor and parts of the area of the 3rd floor of one 3-storey building, the 2nd floor, 3rd floor and parts of the area of the 1st floor of one 3-storey building. The areas used by the factory were owned by the factory. The factory provided the kitchen, canteen and dormitory to the workers.

Building A, 1st floor, around 450 square meters, used for office.

Building B, 1st floor, around 4,200 square meters, used for plastic injection.

Building B, parts of the area of the 2nd floor, around 600 square meters, used for warehouse.

Building B, parts of the area of the 3rd floor, around 3,600 square meters, used for heat transfer printing, assembly, packing and warehouse.

Building C, parts of the area of the 1st floor, around 400 square meters, used for kitchen and canteen.

Building C, 2nd floor, around 1,100 square meters, used for dormitory.

Building C, 3rd floor, around 1,100 square meters, used for dormitory.

From management interview and the lease agreements provided, the factory used the 1st floor of one 4-storey building, the 1st floor, parts of the area of the 2nd floor and parts of the area of the 3rd floor of one 3-storey building, the 2nd floor, 3rd floor and parts of the area of the 1st floor of one 3-storey building. The other areas in the same address were rented to Ningbo Airan Maoyi Co., Ltd., Ningbo Tianqi Keji Co., Ltd. and Ningbo Sikang Plastic Product Factory. The factory did not share worker with other factories in the same address. Only the areas used by the factory were included in the audit.

Operating shifts and hours: The regular working time of the workers were 5 days per week and 8 hours per day. The kitchen worker worked 1 shift: 09:00 to 12:30 and 13:30 to 18:00. The other workers worked 1 shift: 08:00 to 11:30 and 12:30 to 17:00, overtime 18:00 to 20:00 if busy. Overtime on Saturdays if busy.

Time recording system: The working time of the workers was recorded by face recognition attendance machine. The factory provided the attendance records from Apr. 01, 2024 to the audit day. The workers rested at least one day per seven days. The maximum daily overtime were 2 hours. The maximum monthly overtime were 56 hours (e.g. in Aug. 2024, overtime on working days were 16 hours, overtime on weekends were 40 hours.) The maximum weekly working time were 52 hours (standard weekly hours were 40 hours, maximum weekly overtime were 12 hours):

1st sampled month (Aug. 2024)- standard hours (40 hours per week)- maximum weekly overtime (12 hours);

2nd sampled month (Nov. 2024)- standard hours (40 hours per week)- maximum weekly overtime (12 hours);

3rd sampled month (Mar. 2025)- standard hours (40 hours per week)- maximum weekly overtime (12 hours).

Salary payment details: Wage records from Apr. 2024 to Mar. 2025 were reviewed, the workers were paid by monthly rate, the workers were paid at least RMB 3,000 per month and met the legal requirement, the local minimum wage limit was RMB 2,260 per month. The workers were paid on the 25th of the following month. All the workers were paid by cash. 150%, 200%, 300% of the normal wage for overtime on working days, weekends and statutory holidays would be provided to the workers. Paid statutory holidays and annual leave were provided to the workers.

Worker number information:

- Total worker number (46, 16 management workers, 29 production workers, 1 kitchen worker.)
- Production worker number (29, 11 male production workers, 18 female production workers)
- Vulnerable worker number (11 domestic migrant workers including 5 male domestic migrant workers and 6 female domestic migrant workers, no young worker, child worker, pregnant worker, disabled worker. No worker in lactating

period.)

- Any other special group workers (No intern, apprentice and contractor worker.)

Good practices: Nil.

Worker organization details: The workers elected out 1 worker representative. The factory did not have the trade union.

Circumstances: Nil.

The special circumstances can be classified as followed: The auditor checked the Credit China, no special circumstance was identified.

Summary of findings:

1.1: There were findings identified during the audit.

1.4: The monthly overtime of the workers exceeded the legal limit.

2.2: The factory did not analyze the gap between the current situation and the long-term goals.

6.2: The monthly overtime of the workers exceeded the legal limit.

7.1: There were health and safety findings identified during the audit.

7.11: Parts of the goods were put against the wall or pillars.

7.17: 1 step ladder was not installed with handrail.

13.4: The factory did not provide the training on protecting the personal privacy to the workers.

Living wage calculation:

#LivingWage: The living wage data is provided by the auditing company and please refer to the PA5 summary to find the details of calculation method of living wage.

Personal Information protection law: The Personal Information Protection Law of the People's Republic of China was promulgated on August 20, 2021, the producer ensured that relevant personal data and information provided to SGS auditor(s) has been obtained the individual's consent during the audit.

Attachments: The factory did not have the comprehensive working hours system permit, collective bargaining agreement which were not required by the legal requirement.

SITE DETAILS

Site

Ningbo Tianqi Industrial Co.,Ltd

Site amfori ID

156-009755-001

GICS Classification

Sector

Consumer Staples

Industry Group

Household & Personal Products

Industry

Personal Care Products

Sub Industry

Personal Care Products

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	46	Workers
Legal minimum wage in local currency	2,260	Monthly
Lowest wage paid for regular work at the site	3,000	Monthly
Calculated living wage in local currency	3,887	Monthly
Total sample	6	Workers

Other Metrics

Male workers	16	Workers
Female workers	30	Workers
Non-binary workers	0	Workers
Permanent workers - Male	16	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	5	Workers
Management - Female	11	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	5	Workers
Domestic migrant workers - Female	6	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	16	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	2	Workers
Sample - Female	4	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: Ningbo Tianqi Industrial Co.,Ltd | Site amfori ID: 156-009755-001

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>1.1</p> <p>The main auditee partially respects this principle because based on management interview, document review, onsite observation, worker representative interview and workers interview, the factory established a social compliance management system, the factory posted the amfori BSCI Code of Conduct, the factory periodically conducted the social compliance internal audit and management review, but because of management negligence, there were still findings identified during the audit.</p> <p>It violated the requirement of question 1.1 in amfori BSCI system manual.</p>	<p>被审核方部分遵循该准则，原因是基于管理访谈，文件审核，现场审核，工人代表访谈和工人访谈，工厂建立了一个社会责任管理体系，工厂张贴了 amfori BSCI 行为准则，工厂定期进行社会责任内审和管理评审，但是由于管理疏忽，在这次审核过程中还是有问题发现。</p> <p>违反了 amfori BSCI 管理手册中问题 1.1 的要求。</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>1.4</p> <p>The main auditee partially respects this principle because based on management interview, document review, onsite observation, worker representative interview and workers interview, the factory established the workforce planning and cost accounting procedure, but in order to meet the requirement of the delivery, the overtime of the workers was not controlled effectively, the monthly overtime of the workers exceeded the legal limit.</p> <p>It violated the requirement of question 1.4 in amfori BSCI system manual.</p>	<p>被审核方部分遵循该准则，原因是基于管理访谈，文件审核，现场审核，工人代表访谈和工人访谈，工厂建立了产能规划和成本核算程序，但是为了满足出货的要求，工人的加班时间没有得到有效控制，工人的月加班时间超出了法规的要求。</p> <p>违反了 amfori BSCI 管理手册中问题 1.4 的要求。</p>



PA 2: Workers Involvement and Protection

Site: Ningbo Tianqi Industrial Co.,Ltd | Site amfori ID: 156-009755-001

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

Finding

2.2

The main auditee partially respects this principle because the factory established the long-term goals which were based on the amfori BSCI Code of Conduct, but the factory did not analyze the gap between the current situation and the long-term goals.
It violated the requirement of question 2.2 in amfori BSCI system manual.

被审核方部分遵循该准则，原因是工厂建立了基于 amfori BSCI行为准则的长期目标，但是工厂没有分析现状和长期目标之间的差距。
违反了 amfori BSCI管理手册中问题2.2的要求。

PA 6: Decent Working Hours

Site: Ningbo Tianqi Industrial Co.,Ltd | Site amfori ID: 156-009755-001

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

6.2

The main auditee does not respect this principle because based on management interview, worker representative interview, workers interview and the attendance records provided by the factory (from Apr. 01, 2024 to the audit day), the monthly overtime of all the 6 sampled workers exceeded the legal limit:
1st sampled month (Aug. 2024)- standard hours (176 hours)- maximum monthly overtime (56 hours);
2nd sampled month (Nov. 2024)- standard hours (168 hours)- maximum monthly overtime (56 hours);
3rd sampled month (Mar. 2025)- standard hours (168 hours)- maximum monthly overtime (56 hours).
It violated Labor Law of the People's Republic of China (2018 Amendment), Article 41.

被审核方未遵循该准则，原因是基于管理访谈，工人代表访谈，工人访谈和工厂提供的考勤记录（从2024年4月1日到审核当天），6名抽样工人的月加班时间都超出了法规的要求：
第一个抽样月（2024年8月）-标准工时（176小时）-最大月加班（56小时）；
第二个抽样月（2024年11月）-标准工时（168小时）-最大月加班（56小时）；
第三个抽样月（2025年3月）-标准工时（168小时）-最大月加班（56小时）。
违反了中华人民共和国劳动法（2018修正）第四十一条。

PA 7: Occupational Health and Safety

Site: Ningbo Tianqi Industrial Co.,Ltd | Site amfori ID: 156-009755-001

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>7.1</p> <p>The main auditee partially respects this principle because based on management interview, document review, onsite observation, worker representative interview and workers interview, the factory established the health and safety management system and collected the updated laws and regulations, but there were still health and safety findings identified during the audit. It violated the requirement of question 7.1 in amfori BSCI system manual.</p>	<p>被审核方部分遵循该准则，原因是基于管理访谈，文件审核，现场审核，工人代表访谈和工人访谈，工厂建立了健康安全管理体系，收集了最新的法律法规，但是在审核过程中还是有健康安全问题发现。</p> <p>违反了 amfori BSCI 管理手册中问题 7.1 的要求。</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>7.11</p> <p>The main auditee partially respects this principle because the factory obtained the building structure safety report and fire safety report of the buildings used, but from onsite observation, parts of the goods were put against the wall or pillars. It violated General Rules for Fire Safety Management of Storage Occupancies (XF 1131-2014), Article 6.8.</p>	<p>被审核方部分遵循该原则，原因是工厂获得了建筑的竣工验收报告和消防验收报告，但是现场审核发现，部分货物靠墙或靠柱子堆放。</p> <p>违反了仓储场所消防安全管理通则（XF 1131-2014）6.8。</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</p> <p>The main auditee partially respects this principle because from onsite observation, in the plastic injection workshop, 1 step ladder of around 1 m high was not installed with handrail. It violated Safety of Machinery-Permanent Means of Access to Machinery-Part 3: Stairs, stepladders and guard-rails (GB/T 17888.3-2020) 7. 1.</p>	<p>被审核方部分遵循该原则，原因现场审核发现，注塑车间一个高约1m的步梯没有扶手。</p> <p>违反了机械安全 接近机械的固定设施 第3部分：楼梯、阶梯和护栏（GB/T 17888.3-2020）7.1。</p>



PA 13: Ethical Business Behaviour

Site: Ningbo Tianqi Industrial Co.,Ltd | Site amfori ID: 156-009755-001

Question: 13.4 Is there satisfactory evidence that the auditee collects uses and otherwise processes personal information with reasonable care and in accordance with privacy and information security laws and regulatory requirements?	
ENGLISH	LOCAL LANGUAGE
Finding	
13.4 The main auditee partially respects this principle because the factory did not provide the training on protecting the personal privacy to the workers. It violated the requirement of question 13.4 in amfori BSCI system manual.	被审核方部分遵循该准则，因为工厂没有给工人提供有关保护个人隐私的培训。 违反了amfori BSCI管理手册中问题13.4的要求。



Report Date: September 10, 2024
Audit Date: September 3, 2024
Factory ID number: L-3498

To: Mr. Tommy Lu tianqi1 tianqitechnology.com

From: Michael Hu / AECOM Michael.hu aecom.com

Cc: Karen Tiongson / NBCUniversal Karen.Tiongson nbcuni.com
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Subject: **Summary of Findings - Supplier GBS Audit**
Ningbo Tianqi Industrial Co., Ltd. (L-3498)
No.21 Jin'gang Road, Liyang Town, Ninghai County, Ningbo City, Zhejiang Province, China

Audit Cycle: **2nd Audit**
The initial audit was conducted by Michael Hu from AECOM on August 25, 2023.

This report summarizes the findings of the Environment, Health and Safety Audit conducted at the facility of **Ningbo Tianqi Industrial Co., Ltd.** located at **No.21 Jin'gang Road, Liyang Town, Ninghai County, Ningbo City, Zhejiang Province, China.**

The findings of the GBS Reviews were based upon a review of the documents furnished by **Ningbo Tianqi Industrial Co., Ltd.** and the observations obtained by **AECOM** on behalf of NBCUniversal during the Site visit on **September 3, 2024**. For the purpose of this audit, the facility of **Ningbo Tianqi Industrial Co., Ltd.** is referred to as the 'Site' in this report.

Guidance:

The GBS Assessment Report summarizes the Site audit findings and includes a corrective, and preventative action plan that both the Auditor and the Site Manager believe is reasonable to ensure conformity with the country specific and local laws.

NBCUniversal (NBCU) upholds a worldwide reputation for integrity and high standards of business conduct. NBCU Supplier Relationship Policy requires that we source only from Factories who comply with local laws and any applicable NBCU standards in such areas as labour, environment, health and safety. In order to ensure compliance with applicable laws and company policies, please provide evidence of closure on all open red findings within 90 days from receipt of report.

If you have any questions about the memorandum please contact Michael Hu / AECOM
Michael.hu aecom.com, and Karen Tiongson / NBCUniversal Karen.Tiongson nbcuni.com

"AECOM" (on behalf of NBCUniversal)

Supplier General Information	
Name of Factory	Ningbo Tianqi Industrial Co., Ltd. (宁波天祺实业有限公司)
Physical Location Address	No.21 Jin'gang Road, Liyang Town, Ninghai County, Ningbo City, Zhejiang Province, China (中国浙江省宁波市宁海县力洋镇金港路 21 号)
Factory Contact Name <input type="checkbox"/>	Mr. Tommy Lu / Business Manager (销售经理)
Factory Contact Number/Email	Mobile: <input type="checkbox"/> 86-13285748143 Email: tianqi1 <input type="checkbox"/> tianqitechnology.com
Official Factory Website	None
Waivers from Government	None
Certifications received from Government or other Companies.	None
Principle Products Manufactured	Plastic Cups
Annual Output of Products	Approximately 9 million cups
Major Customers	Walmart
Production Process	Mold making, crushing, injection molding, heat transfer printing, assembly and packing
Factory Normal Working Days and Normal Work Hours	All departments (except for injection molding department) run five days (from Monday to Friday) per week in one shift. Daily working hours: 8:00 <input type="checkbox"/> 11:30; 12:30 <input type="checkbox"/> 17:00 (8 hours per day)
Departments that run more than one shift	Injection molding department runs two shifts per day and five days per week (from Monday to Friday) 1 st shift: 07:30-15:30; and 2 nd shift: 15:30-23:30
Peak Production Months	None
Number of Production Buildings	One 3-story production building
Canteen/Cafeteria Services	The canteen located on the 1 st floor of one 3-story dormitory
Dormitories	One 3-story dormitory
Security	There were 4 outsourced security guards working at the gate of the Site in 24 hours a day and seven days per week in 2 shifts. The Site installed closed-circuit television system onsite.
Overall findings	In view of findings raised, non-compliances were observed in the area of wages and compensation, fire protection, occupational hazards and EHS permits. Details of the findings are listed below. For all other areas, no violations or non-compliances were noted.

Findings	<p>Total Findings – 6</p> <p>Black Flags – 0</p> <p>Red Flags - 2</p> <p>Yellow Flags - 4</p>
<p>Permits - the following government documents and permits were provided for review.</p>	<ol style="list-style-type: none"> 1. Safety Management Certificate for Mr. Li Xiaozhe, issued by Zhejiang Safety Production Internet Institute, valid until December 31, 2025; 2. Environment Impact Assessment (EIA) Statement Form for annual producing 18 million plastic goods Technology Improvement Project and corresponding Approval, issued by Environmental Protection Bureau (EPB) of Ninghai County, July 24, 2018; 3. Self-assessment Environmental Protection Check and Acceptance (EPCA) Report, August 2018; 4. Pollutants Discharge Registration Form and its Return Receipt (913302265511423553001X), valid until May 13, 2025; 5. Environment Monitoring Report for domestic wastewater, canteen fume, fugitively air emission and boundary noise, prepared by Ningbo Yonglan Testing Technology Co., Ltd., May 2024; 6. Empty De-mold Agent Containers Recycle Agreement with the suppliers and Recycle Record, 2024; 7. Industrial Hygiene Monitoring Report for Workplace Noise and Dust, prepared by Ningbo Yuanda Inspection Co., Ltd., August 2024; 8. Use Permits and Inspection Reports of 2 elevators, 3 forklifts and 4 cranes, all within valid period; 9. Special Operation Certificates of 1 electrician and 1 welder, both within valid period; 10. Special Equipment Operation Certificates of 2 forklift operators and 1 special equipment administrator, all within validity period; 11. First Aider Certificates of 2 workers, issued by Ningbo Red Cross, both within validity period; 12. Food Business Permit, issued by Ninghai Market Supervision and Administration Bureau, valid until March 27, 2028; 13. Health Certificates of 2 food handlers, both within validity period; and 14. One Fire Protection Check and Acceptance (FPCA) Approval for one 4-story office building, one 3-story dormitory and one 3-story production building, issued by Ninghai Fire Brigade, dated July 20, 2012.
<p>Audit Score Percentage and Audit Re-e^{ntension} Status</p>	<p>94%</p> <p><i>NBCUniversal has implemented an audit performance scoring system for the purpose of granting extensions to the company's annual re-audit requirement. This score is used to calculate re-audit timing only and is <u>not</u> approval for production to commence.</i></p> <p><u>Audit Approval Extensions:</u></p> <ul style="list-style-type: none"> ○ <u>Extensions may be offered only if the factory has corrected and closed all findings.</u> NBCU discretion is allowed. Note all approval periods are from the audit date. ○ Below 85%= 12 month approval

	<ul style="list-style-type: none"> ○ 85%-92%= 18 month approval ○ 93% and above= 24 month approval <p><u>Production Authorization:</u></p> <ul style="list-style-type: none"> ○ If this is the initial audit of the factory production cannot commence <u>until all red flagged findings are addressed</u> and official notification is received from the NBCUniversal business unit. Please note that production is not allowed until your factory has been approved and an NBCU approval letter is received.
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Background

In 2010, Ningbo Kaidong Sports Goods Co., Ltd. ("Kaidong" hereafter) was established at the Ningbo City and started its operation.

In 2012, Kaidong purchased the current land, built all the constructions, moved to the current location and continued its production. Prior to 2012, this area was farmland.

In 2013, Kaidong changed its name to Ningbo Tianqi Mold Plastic Co., Ltd. (the "Site" hereafter).

In 2018, the Site changed its name to Ningbo Tianqi Industrial Co., Ltd..

The Site covered a gross area of about 17,826 square meters (m²) and a construction area of 17,721 m². The Site comprised one 4-story office building, one 3-story dormitory and one 3-story production building. One canteen was located on the 1st floor of the dormitory. Part of the 2nd floor of the production building was leased to Ningbo Tianqi Technology Co., Ltd. for air cleaner production. Based on the Site representative, Ningbo Tianqi Technology Co., Ltd. had no relationship with NBCU products. During the audit, no production of Ningbo Tianqi Technology Co., Ltd. was observed.

The main raw materials used at the Site are steel and plastic particles, including polypropylene (PP) and polyethylene (PE). The main chemicals used at the Site are de-molding agent and liquid petroleum gas. Based on the Site representative, the machine maintenance was outsourced to another company. There was no machine oil stored at the Site during the audit.

Vicinity of the Site building is as follows:

- North: Ningbo Tianji Energy Saving Optoelectronic Co., Ltd.;
- South: Ningbo Ruining Electrical Equipment Co., Ltd.;
- West: Schmalz Technology (Ningbo) Co., Ltd.; and
- East: Jingang Road and residential area across the road.

Based on the Self-assessment Environment Protection Check and Acceptance (EPCA) report and onsite observation, no process wastewater was discharged from the Site. Domestic wastewater generated from the Site was treated by onsite septic tank and then discharged into the local municipal sewage system. Canteen fume was discharged through one outlet after being-treated by fume purifier. Non-methane hydrocarbon and dust from injection molding process was discharged fugitively.

Based on the industrial hygiene monitoring report in 2024 and onsite observation, the occupational health hazards mainly are dust and noise from the crushing machines. Based on the employee roster and employee interview, only 1 worker operated the crushing machine. No employee for crushing machine operation was hired or left in the past year.

There were two single-story buildings built by one customer of the Site named Aisen Trade Co., Ltd. as office and warehouse in the Site compound. Based on the Site representative, they could not provide Fire Protection Check and Acceptance (FPCA) approval of these two buildings, because these two buildings were built and used by other company. One company statement from Aisen was provided to prove that these two buildings were built and used by Aisen and no related to NBCU products. As observed during a quick site tour at these two buildings, fire extinguishers and fire hydrants were provided in these buildings. The fire distance met the requirement. These two buildings were not allowed to be included in the audit scope.

GBS/EHS Management:

Mr. Li Xiaozhe is responsible for the overall management of Environment, Health and Safety (EHS) issues of the Site. He holds the valid Safety Management Certificate.

Employee Interview

Number of Selected Employees: There were 80 employees in the Site. 25 workers were selected for the worker interview.

Age Groups/Gender: Of the interviewed workers, 4 were 20 to 30 years old, 14 were 30 to 50 years old and 7 were over 50 years old, including 15 males and 10 females.

Employment Period: Of the interviewed workers, 4 have been hired for less than 1 year, 13 have been hired for 1 to 3 years and 8 have been hired for more than 3 years.

Operational Activities: All the interviewed workers were from the injection molding, heat transfer printing, mold making and packing workshops.

Finding Numbers: 1 (4.2a)

Best Practices:

The Site conducted the fire drills twice a year. The general housekeeping was well maintained.

Opening and Closing Meetings:

An opening meeting was conducted at 9:00 am and attended by the Site representative Mr. Liu Tong (Administrative Manager) together with Michael Hu (AECOM Auditor). The auditor introduced the purpose, content and procedure of the audit, NBCU Manufacturer Code of Conduct (CoC), as well as the Factory Awareness Guide. The Site representative Mr. Liu signed the NBCU Manufacturer CoC.

A closing meeting was conducted at about 4:30 pm and attended by the Site representative Mr. Liu Tong and Michael Hu. The auditor raised the issues identified and introduced the follow-up section. All findings were confirmed by the Site representative. The Site representative expressed that they were willing to follow the relevant requirements of NBCU and close the findings as soon as possible.

Results Summary

Section	Is there a finding <input type="checkbox"/>	If there is a finding, then list finding ID/Flag Type	Auditor Notes
Underage Labor	No	/	/
Forced Labor	No	/	/
Prison Labor	No	/	/
Working Hours	No	/	/
Wages & Compensation	Yes	4.2a- Yellow Flag	/
Discrimination/Human Rights	No	/	/
Freedom of Association	No	/	/
Facilities/Building Conditions	No	/	/
Fire Prevention/Emergency Response	No	/	/
Occupational Health & Safety <input type="checkbox"/> Include all permits <input type="checkbox"/>	Yes	1.3 - Yellow Flag 2.22 - Red Flag 2.37- Red Flag	/
Environmental Conditions <input type="checkbox"/> Include Waste, Air, Water <input type="checkbox"/>	Yes	1.2 - Yellow Flag 1.7 - Yellow Flag	/
Dormitories	No	/	/
Canteen & Cafeteria Services	No	/	/
Medical	No	/	/
Security	No	/	/

1. Number of Fulltime Employees/Workers

Department	First Shift	Second Shift	Third Shift as applicable	Peak Season
Administration	13	/	/	/
□A□□C	2	/	/	/
Warehouse	3	/	/	/
Crushing	1	/	/	/
Injection Molding	9	8	/	/
Heat Transfer Printing	2	/	/	/
Mold Making	7	/	/	/
Assembly and Packing	35	/	/	/
Total Number of Employees/Workers	72	8	/	/


2. Production Process – include chemicals used in the production process


Production process	Check if applicable to Site	Chemicals used	Approximate volume of chemicals used/stored monthly
Injection Molding	Yes	De-mold agent	2 L per month
Mold Making	Yes	LPG	2kg per month
Raw Materials	Yes	PP□PE	100 ton per month

Findings to be Addressed:

NBCUniversal has implemented an audit performance scoring system for the purpose of granting extensions to the company's annual re-audit requirement. This score is used to calculate re-audit timing only and is not approval for production to commence.

- **Audit Approval Extensions:**
 - If the factory scores below 85% on an audit, a 12-month re-audit cycle will apply, without exception.
 - If the factory scores 85% or better **and corrects and closes all audit findings**, the factory could qualify for an extension of the re-audit. The annual audit requirement may be extended to 18 or 24 months depending on the audit score.
- **Production Authorization:**
 - If this is the initial audit of the factory production cannot commence **until all red flagged findings are addressed** and official notification is received from the NBCUniversal business unit. Please note that production is not allowed until your factory has been approved and an NBCU approval letter is received.

No. 编号	Finding Category 问题点类别	Repeat Finding 是否重复	Flag Type 红黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
2.22	PPE 个人防护用品	No 否	Red 红旗	<p>2.22 Based on the industrial hygiene monitoring report in 2024 and onsite observation, the occupational health hazards mainly are dust and noise from the crushing machines. However, no personal protective equipment (PPE) warning sign or occupational hazards warning sign were posted at this area. The Site provided the proper masks and ear plugs for the worker.</p> <p>（根据 2024 年的工业卫生检测报告和现场走访，工厂的职业健康危害因素主要为碎料机产生的粉尘和噪音。但是工厂在碎料机附近没有张贴需要个人防护用品标识和职业危害警示标识。工厂为该操作工提供了 合适的口罩和耳塞。）</p>	<p>2.22 The Site should post the PPE warning sign and occupational hazards warning sign of dust and noise near the crushing machines.</p> <p>（工厂应该为碎料机张贴个人防护用品标识以及噪音和粉尘的职业危害警示标识。）</p>	

No. 编号	Finding Category 问题点类别	Repeat Finding 是否重复	Flag Type 红黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
2.27	Electrical Safety 用电安全	No 否	Red 红旗	<p>2.27 The following deficiencies were observed at one power distribution box on the 3rd floor of the production building:</p> <ol style="list-style-type: none"> 1. No insulation protective cover was provided for the circuit breaker; 2. No arc separators were installed for the wire inlet and outlet ports of circuit breaker; 3. The facility wrapped the hot wires on the two terminals of the circuit breaker rather than using cable lugs. <p>（厂房 3 楼的一个配电箱内发现如下问题：</p> <ol style="list-style-type: none"> 1. 没有为断路器提供绝缘防护挡板； 2. 没有为断路器的进线和出线口提供隔弧片； 3. 工厂将火线以缠绕的方式连接至断路器的 2 个端子上，而不是用专门的接线头。） 	<p>2.27 The Site should install insulation protective cover and arc separators for the circuit breaker; The Site should use standard cable lugs to connect the hot wires.</p> <p>（工厂应该为该断路器提供绝缘防护挡板以及隔弧片，另外工厂应该使用专门的接线头连接火线。）</p>	

No. 编号	Finding Category 问题点类别	Repeat Finding 是否重复	Flag Type 红黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
1.2	Environmental Permits 环境许可文件	Yes 是	Yellow 黄旗	<p>1.2 The Site provided one Environment Impact Assessment (EIA) statement form for annual producing 18 million plastic goods technology improvement project and corresponding approval in July 2018. The self-assessment Environment Protection Check and Acceptance (EPCA) was conducted and corresponding report in August 2018 was provided. However, the Site could not provide the registration record on the national platform.</p> <p>（工厂提供了一份 2018 年关于年产 1800 万个塑料件技术改造项目的环评报告表以及批</p>	<p>1.2 The Site should publicize the self EPCA report on the national platform and keep the registration record.</p> <p>（工厂应该在国家企业自主验收公示平台进行公示，并取得备案记录。）</p>	N/A

No. 编号	Finding Category 问题点类别	Repeat Finding 是否重复	Flag Type 红黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
				复。该项目进行了自主环境保护验收，并提供了一份 2018 年 8 月份的自主环境保护验收报告。但是工厂无法提供该自主验收在国家企业自主验收公示平台上的备案记录。)		
1.3	Health <input type="checkbox"/> Safety Permits 健康和安全 许可文件	Yes 是	Yellow 黄旗	1.3 Based on the industrial hygiene monitoring report in 2023 and onsite observation, the occupational health hazards mainly are dust and noise from the crushing machines. However, the Site had not registered its occupational health hazards or obtained corresponding receipt yet. (根据 2023 年工业卫生检测报告和现场走访，工厂的职业危害因素包括碎料机产生的粉尘和噪音。然而，工厂尚未登记其职业病危害因素并取得回执。)	1.3 The Site should consult the local Health Bureau to register the correct occupational health hazards on the website (www.zybwahsb.com) and exposure information, and obtain the return receipt. (工厂应咨询当地卫生部门，在网站 (www.zybwahsb.com) 上准确申报存在的职业病危害因素及接触人数，并取得回执。)	N/A
1.7	Health <input type="checkbox"/> Safety 健康和安全	Yes 是	Yellow 黄旗	1.7 One environment monitoring report in 2024 was provided. However, only the boundary noise at the daytime was monitored. The Site did not monitor the boundary noise at night as required after completing the self-EPCA. (工厂提供了一份 2024 年的环境检测报告，但是其中只检测了昼间的厂界噪音。工厂在自主验收之后没有按要求对于夜间的厂界噪音进行过检测。)	1.7 The Site should contact a qualified institute to conduct the boundary noise monitoring at night. If the monitoring results were not in compliance with pertinent standards, proper measures should be taken to control the boundary noise level. Based on the EIA approval and self-EPCA report in 2018, the boundary noise at the daytime and at night should meet Class III of Emission Standard for Industrial Enterprise Noise at Boundary (GB12348-2008). (工厂应该联系有资质的机构对于夜间的厂界噪音进行检测，如果结果超过相关标准，需要采取有效措施降低厂界噪音。 根据 2018 年的环境影响评价批复和自主环境保护竣工验收报告，工厂昼夜的厂界噪	N/A

No. 编号	Finding Category 问题点类别	Repeat Finding 是否重复	Flag Type 红黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
					音需要达到《工业企业厂界环境噪声排放标准》三类标准。)	
4.2a	Wages 工资	Yes 是	Yellow 黄旗	<p>4.2a There were 80 employees at the Site, including 9 employees over retiring age. According to the social insurance receipts of August 2024, the Site provided 5 types of social insurances (work-related, retirement, medical, maternity and unemployment insurance) for 55 employees. No social insurances were provided for the rest 16 employees. The Site management stated that part of the rest workers did not want to pay for their parts of the social insurance. This finding was confirmed through the worker interview.</p> <p>(此次审核, 工厂共有 80 名员工, 包括 9 名超过退休年龄的员工。根据 2024 年 8 月的社保缴费收据, 工厂为 55 名员工缴纳了工伤、失业、养老、医疗和生育保险。但是工厂没有为余下的 16 名员工。工厂管理表示部分剩余员工不愿缴纳员工部分的社保费用。该问题通过员工面谈核实。)</p>	<p>4.2a The Site should provide five types of social insurances to all workers.</p> <p>(工厂应为所有员工提供五种社会保险。)</p>	N/A

Notes

1. **Black Flag** - if there is a finding of possible child or prison labor, factory will be disqualified for use if confirmed.
黑旗 – 如果工厂有疑似童工或者狱工的问题点，确认后，工厂将被取消使用资格。
2. **Red Flag** - all red flags findings must be closed or downgraded within 90 days of the audit. (If you are unable to meet the closure timeline please contact Michael Hu / AECOM □Michael.hu□ aecom.com□ and Karen Tionson / NBCUniversal □Karen.Tionson□ nbcuni.com□)
红旗 – 所有的红旗问题点都必须在审核后的 90 天内关闭或者降级（如果在规定的时间节点内无法完成整改，请联系 Michael Hu / AECOM □Michael.hu□ aecom.com□ 和 Karen Tionson / NBCUniversal □Karen.Tionson□ nbcuni.com□）。
3. **Yellow Flag** - all yellow flag findings must be closed before scheduled re-audit.
黄旗 – 所有的黄旗问题点都必须在预定的复审时间之前关闭。

Photo Summary:

	
Entrance view from the Site	Photo of Factory Sign (if available)
	N/A
Exterior Photos	Exterior Photos
	
Front of Factory Compound	Back of Factory Compound



Injection Molding Workshop



Mold Making Workshop



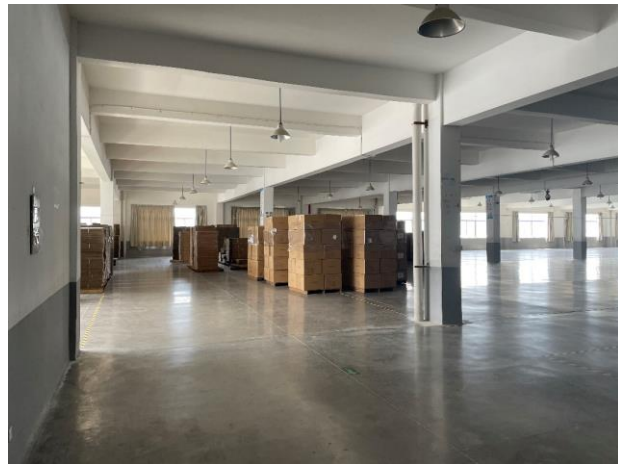
Heat Transfer Printing Machine



Assembly Workshop



Packing Workshop



Finished-good Warehouse



Crushing Machine



Dormitory



Canteen