

Monitored Party DONGGUAN APEX FLOW FASHION LIMITED	amfori ID 156-066271-000	Address Room 801, No. 83 Botou Road, Humen Town, Dongguan City, Guangdong Province, Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner Bureau Veritas Hong Kong Limited
Monitoring Start Date 31/10/2025	Closing Meeting Finished Date 31/10/2025	Submission Date 08/11/2025
Expiration Date 08/11/2026	Announcement Type Semi Announced	
Site DONGGUAN APEX FLOW FASHION LIMITED	Site amfori ID 156-066271-001	

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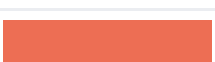
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OVERALL RATING



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	B	
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: Mike Peng CSCA21704159

Name of team auditor (if applicable): NA; APSCA membership number: NA

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

Monitoring partner name: Bureau Veritas Consumer Products Service

Audit Company APSCA Number: 11600002

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

Business partner information: DONGGUAN APEX FLOW FASHION LIMITED (the name in Chinese was 东莞市世锦服饰有限公司, Business License No. was 91441900MA51H82A64) was established on April 8, 2018 and the address was Room 801, No. 83 Botou Road, Humen Town, Dongguan City. (the address in Chinese was 广东省东莞市虎门镇虎门博头路83号801室). The auditee specialized in the manufacture of apparel and accessories. The main production processes included cutting, sewing, ironing, inspection and packing. According to the factory management, peak season was not obvious.

Audited location information: The details of floors were listed below. No dormitory, kitchen or canteen was set in the factory. The areas were rented from others

Building 1: 11-storey building

Floor 1: used by other company named 广东禾计划餐饮科技有限公司

Floor 2: idle

Floor 3: used by other company named 东莞市卓然服饰有限公司

Floor 4: used by other company named 东莞市初拾服饰有限公司

Floor 5-7: used by other companies

Floor 8: used by auditee as production floor (cutting, sewing, ironing, inspection and packing), warehouse and office

Floor 9-10: used by other company

Floor 11: idle

Remark:

The auditee claimed the factories in the zone operated individually, they did not have any business relationship with them, except company name, no further information was provided. This audit only included the floors used by auditee.

Operating shifts and hours: Per management and document review, production workers worked in one shift, the working hour was 8:00-12:00, 13:30-17:30. Workers worked 8 regular hours per day and 40 regular hours in a week. According to the sampled time records, it was noted that the maximum working hours were 10 hours per day, 54 hours per week and maximum overtime were 66 hours per month. Employees worked 6 days consecutively at most.

Time recording system: The factory adopted face scanning system to record working hours of production employees.

Salary payment details: According to payroll records review and interview, all employees were paid RMB12.07 per hour, as equivalent to RMB2100 per month, which met local minimum wage standard RMB1900 per month before March 2025 and RMB2080 per month since March 2025. Wages were paid at the end of next month by cash.

Worker number information:

There were a total of 43 employees with 7 non-production employees and 36 production workers (21 males and 15 females). There were 38 domestic migrant employees in the factory (21 males and 17 females). The youngest employee noted during this audit was 23 years old.

No foreign migrant, young, pregnant, seasonal, temporary, disabled or home-based workers were noted in the factory.

Any other special group workers (interns, apprentices, contractor workers etc.): None

Good practices: Hygiene kits (e.g. products for nursing) were prepared for employees and for free.

Worker organization details: No worker union was established. 2 worker representatives were elected by workers, and a suggestion box was available in the workplace.

Circumstances: There was no special circumstance during the audit.

Summary of findings:

PA1.1 The social management system was not effective since some non-compliance issues were detected regarding Workers Involvement and Protection, Fair Remuneration, Occupational Health and Safety etc.

PA1.4 The factory had established overtime management policy, however, they did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit.

PA2.2 The auditee did not trace the long term goals regularly.

PA5.5 Insufficient social insurance for employees.

PA6.2 Overtime working hours exceeded legal requirement.

PA7.8 The accident procedures were not visually displayed to exposed workers and first-aid personnel.

PA7.17 Sewing machine without needle guards.

PA7.22 No toilet paper or hand wash facility was supplied in the toilet.

PA13.1 The auditee conducted risk assessment on corruption, but the prevention measures of all risks were the same.

Living wage calculation: Living wage refer to the BNW attachment. BV has used the methodology which is similar with Anker Benchmark methodology to estimate the living wage by estimating the cost of a basic but decent life style for a worker and his/her family. This involves adding up the cost of three expenditure groups: food (for a low-cost nutritious diet), housing (for basic healthy housing), and other essential expenses for a family, and then adding a small margin for sustainability and emergencies. The reason BV does not use Anker benchmark is the data in GLWC is not reasonable with the area where the factory is located. The data source: onsite audit information collection (BV BNW).

Remark:

1. There was no contractors or agencies used by the auditee, which made the contractor license/permit and agency labour contract not applicable. No Government waivers or Collective bargaining agreements was available.
2. As of the current project category, production process, scale and pollutant status, the construction project was not included in the environmental impact assessment management scope.

SITE DETAILS

Site

DONGGUAN APEX FLOW FASHION LIMITED

Site amfori ID

156-066271-001

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Textiles, Apparel & Luxury Goods

Sub Industry

Apparel, Accessories & Luxury Goods

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	43	Workers
Legal minimum wage in local currency	2,080	Monthly
Lowest wage paid for regular work at the site	2,100	Monthly
Calculated living wage in local currency	2,508.23	Monthly
Total sample	5	Workers

Other Metrics

Male workers	25	Workers
Female workers	18	Workers
Non-binary workers	0	Workers
Permanent workers - Male	25	Workers
Permanent workers - Female	18	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	1	Workers
Management - Female	0	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	21	Workers
Domestic migrant workers - Female	17	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	25	Workers
Workers hired directly - Female	18	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	3	Workers
Sample - Female	2	Workers
Sample - Non-binary	0	Workers

FINDINGS

PA1: Social Management System

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

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	
Through onsite tour, documentation review and interview, the social management system was still needed to be improved since some non-compliance issues were detected regarding Workers Involvement and Protection, Fair Remuneration, Occupational Health and Safety etc. Please refer to BSCI PA1.1 for reference. The facility management declared that they would try to improve themselves according to the findings. This question is rated as partially because the management system was generally effective.	根据现场走访，资料查阅及访谈，发现工厂的社会责任管理体系尚待完善，因为在此次审核中，发现了关于工人参与和保护，公平报酬，职业健康与安全等方面的问题。请参看BSCI PA1.1。被审核方解释他们会根据问题点作出改进。此问题等级为部分不符合因为工厂的管理体系大致是有效的。

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	
Through documentation review, the factory had established overtime management policy, however, they did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' monthly overtime hours exceeded legal limit. Please refer to BSCI PA 1.4. The facility management declared that they would try to reduce overtime hours as required. This question is rated as partially because the auditee had established overtime management procedures and a sense of control over overtime.	根据资料审阅，发现工厂虽然有建立加班管理程序，但没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期，以致于员工月加班超出法律规定。请参看BSCI PA1.4。被审核方解释他们会尽量减少加班时间以符合要求。此问题等级为部分不符合因为工厂已有加班管理程序，也有控制加班的意识。

PA 2: Workers Involvement and Protection

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

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	
Per document review and management interview, it was noted that the factory defined long term goals to protect workers according to the BSCI COC. But the factory did not trace the goals regularly. Please refer to BSCI PA 2.2. This question is rated as partially because the auditee had defined the long term goals as required.	经过文件查阅和管理层访谈，审核员发现工厂有按照BSCI行为守则的期望制定明确保护工人的长期目标，但工厂没有对目标进行追踪。请参看 BSCI PA 2.2。此问题等级为部分不符合因为工厂已经按要求建立了长期目标。

PA 5: Fair Remuneration

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

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	
According to the social insurance payment receipt provided by auditee management, it was noted that 2 out of 43 employees (5%) were provided with medical insurance, accident insurance, pension insurance, maternity insurance and unemployment insurance in October 2025. In addition, the auditee provided commercial insurance to all employees, the valid period was from October 22, 2025 to October 21, 2026. Please refer to Article 73 of the Labor Law of the People's Republic of China. The facility management declared that currently they just provided social insurance to main managements, and they would try to improve the purchase rate in the future. This question is rated as No because not all types social insurance covered over 80% employees.	根据被审核方提供的2025年10月社会保险缴费单据显示被审核方为2/43名员工(5%)提供医疗，工伤，养老，生育和失业保险。另外被审核方为所有员工提供了商业意外保险，有效期为2025年10月22日至2026年10月21日。请参看《中华人民共和国劳动法》第73条。被审核方解释现在工厂只为主要管理人员提供社保，以后尽可能增加社保的购买比例。此问题等级为不符合因为并不是所有险种都覆盖80%以上员工。

PA 6: Decent Working Hours

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

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
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Finding

According to the attendance records provided by auditee, it was noted that 15 out of 15 sample population employees worked in excess of the statutory overtime hour limits.

A review of 15 sample population employees' time records (5 samples selected from September 2025 as current paid month, 5 samples selected from January 2025 as random month, 5 samples selected from March 2025 as random month) yielded the following:

- 1) 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 50 hours) in January 2025, which was not in compliance with the legal requirement;
- 2) 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 66 hours) in March 2025, which was not in compliance with the legal requirement;
- 3) 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 60 hours) in September 2025, which was not in compliance with the legal requirement.

Please refer to Article 41 of the Labor Law of the PRC. The facility management declared that the exceeded overtime was occurred due to delivery time, overtime working was voluntary. This question is rated as No because this is a system problem.

根据被审核方提供的工时记录，审核员发现员工加班时间超出了法定标准。

审核员从被审核方提供的工时记录中抽取15个样本(其中最近工资支付月2025年9月抽5个，从随机月份2025年1月抽5个，从随机月份2025年3月抽5个)，发现共有15个样本加班时间超出了法定标准，具体为：

5/5名抽样员工在2025年1月的加班时间为50小时，超过每月加班时间不能超过36小时的法律规定；

5/5名抽样员工在2025年3月的加班时间为66小时，超过每月加班时间不能超过36小时的法律规定；

5/5名抽样员工在2025年9月的加班时间为60小时，超过每月加班时间不能超过36小时的法律规定。

请参看《中华人民共和国劳动法》第41条。被审核方解释加班超时是因为货期原因，加班都是员工自愿的。此问题等级为不符合因为此为系统性问题。

PA 7: Occupational Health and Safety

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

Question: 7.8 Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures?

ENGLISH

LOCAL LANGUAGE

Finding

Through onsite tour, it was noted that the accident procedures were not visually displayed to exposed workers and first-aid personnel. Please refer to BSCI PA7.8. The facility management declared that they did not clear such requirement. This question is rated as No because the auditee did not have sufficient action for this point.

现场走访发现被审核方的事故应急处理程序没有张贴以供员工和急救人员使用。请参看BSCI PA7.8。被审核方称他们并不清楚此要求。此问题等级为不符合，因为工厂在此问题点没有足够行动。

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	
Through onsite observation, it was noted that 5 out of 10 sampled sewing machines were not equipped with needle guards. Please refer to Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene. The facility management declared that they had noted this finding, but did not solved in time. This question is rated as No because the auditee did not have sufficient action for this point.	现场走访发现车间所有抽样的5/10台针车没有安装挡针。请参看《生产设备安全卫生设计总则 (GB5083-1999)》第6.1.6条。被审核方解释他们已知晓此问题，但并未及时解决。此问题等级为不符合，因为被审核方在此问题点上无足够行动。

Question: 7.22 Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?

ENGLISH	LOCAL LANGUAGE
Finding	
Per auditee tour, it was noted that no toilet paper or hand wash facility was supplied in the toilet. Please refer to BSCI PA 7.22. The facility management declared that they did not notice this requirement. This question is rated as No because the auditee did not have sufficient action for this point.	现场走访发现被审核方没有在厕所提供纸巾和洗手用品。请参看BSCI PA7.22。被审核方称他们没注意到此要求。此问题等级为不符合，因为工厂在此点并未有足够行动。

PA 13: Ethical Business Behaviour

Site: DONGGUAN APEX FLOW FASHION LIMITED | Site amfori ID: 156-066271-001

Question: 13.1 Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?

ENGLISH	LOCAL LANGUAGE
Finding	
Through documentation review, it was noted that the auditee had conducted risk assessment on corruption, but the prevention measures of all risks were the same, such as setting supervisory phone and conducting joint meeting, etc. Please refer to BSCI PA 13.1. This question is rated as partially because the auditee had conducted risk assessment.	根据文件审阅，工厂做了廉政风险评估，但所有风险的预防措施都是相同的，例如设置监督电话和设置联席会议等。请参看BSCI PA 13.1。此问题等级为部分不符合，因为工厂已经进行了风险评估。