# **ILS Social Compliance Audit**

Audit Reference #: (audit firm internal)	A4929038	Audit ID #: (Disney's ID)	NA
Date Audit Started: Year/Mo/Day	2021/06/08	Date Audit Completed: Year/Mo/Day	2021/06/08
Code Conducted to:	Disney	Audit Report Date: Year/Mo/Day	2021/06/16
Audit Type:	Initial Audit	<b>Special Program:</b> (only required if applicable to NDAs)	None

## **Facility Information**

Facility ID No.:	NA		
Facility Name:	Xingtai Beiren Printing Co., Ltd.		
Address Line 1:	No. 8 North Side of Guanghua Street, Renze Economic Development Zone, Xingtai City, Hebei Province		
Address Line 2:			
City:	Xingtai	State/Province:	Hebei
Town:		Country:	China
Zip Code:	054000	GPS Location:	
Contact Name: (First and Last)	Luping Li	Contact Person Title:	Manager
Primary Email:	beirenyingxiaobu@126 .com	Phone Number: Country code – area code / phone number	86- 18832924273
Contact Person Title:	Manager	Fax: Country code – area code / phone number	

## Name/Address/Ownership Updates

Facility Name:	None observed
Facility Address:	None observed
Facility Ownership Update:	None observed
Upcoming Relocation or Expansion:	None observed

## Audit Team

Audit Firm:	Intertek
Number of Auditors:	2

	Name	APSCA Registration Number	APSCA Certification Number
Audit Team Member 1: (Lead/Exclusive Auditor)	Snail Zhang	21700534	21700534
Audit Team Member 2:	Bella Feng	21700438	21700438
Audit Team Member 3:			
Audit Team Member 4:			
Audit Team Member 5:			
Audit Team Member 6:			
Audit Team Member 7:			
Audit Team Member 8:			
(Note: In FANS, please input au 1 row for each auditor)	ditor(s)' APSCA Registration Number(s) in	the Cross-Reference	Tab of the DDM –

## Audit Details & Assessment

## **Facility Details**

Access to Facility:	Accepted		
Access to Facility - Predetermined Comments	Acceptable	mpted to conduct an audit a	and were denied access.
Access to Facility - Additional Comments:			
Current % Capacity Devoted to Disney:	1	Past % Capacity Devoted to Disney:	1
Products Produced:	Guest Shopping	- Packaging Materials	
Disney Products Observed:	packaging bag		
Production Processes:	Film blowing, Printing, Laminated film, Cutting, Bag making, Inspection, Packaging		
1100033031			
# Total Employees:	188	<b>#Production Employees</b> :	: 143
# Total	188 7	<b>#Production Employees</b> :	: 143
# Total Employees:	7 1/office and can	<b>#Production Employees:</b> teen and kitchen, 2/worksho warehouse, 4/warehouse, 5	op and warehouse,
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production</li> </ul>	7 1/office and can 3/workshop and	teen and kitchen, 2/worksho	op and warehouse,
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> </ul>	7 1/office and can 3/workshop and 7/dormitory.	teen and kitchen, 2/worksho warehouse, 4/warehouse, 5	op and warehouse, 5/warehouse, 6/warehouse,
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production</li> </ul>	7 1/office and can 3/workshop and 7/dormitory.	teen and kitchen, 2/worksho warehouse, 4/warehouse, 5	op and warehouse, 5/warehouse, 6/warehouse,
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production</li> </ul>	7 1/office and can 3/workshop and 7/dormitory.	teen and kitchen, 2/worksho warehouse, 4/warehouse, 5	op and warehouse, 5/warehouse, 6/warehouse, September October
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production</li> </ul>	7 1/office and can 3/workshop and 7/dormitory. Unknown None January	iteen and kitchen, 2/worksho I warehouse, 4/warehouse, 5 April May June	op and warehouse, 5/warehouse, 6/warehouse, September October November
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production</li> </ul>	7 1/office and can 3/workshop and 7/dormitory. Unknown None January February	teen and kitchen, 2/worksho I warehouse, 4/warehouse, 5 April May June July	op and warehouse, 5/warehouse, 6/warehouse, September October November
<ul> <li># Total Employees:</li> <li># Buildings:</li> <li># Buildings by Purpose:</li> <li>Peak Production Months:</li> </ul>	7 1/office and can 3/workshop and 7/dormitory. Unknown None January February March	teen and kitchen, 2/worksho warehouse, 4/warehouse, 5 April May June July August	op and warehouse, 5/warehouse, 6/warehouse, September October November December

	February     March	July August	December
Facility Regular Hours:	NA	Facility # of Shifts/Hours	Production: 2 / 8:00-20:00, 20:00-8:00 with 2 hours' break time per shift;
			Non-production: 1 / 8:00- 12:00 and 14:00-18:00
Other Brands Present?	Mengniu Dairy, Yili		
Establishment Date: Yr/Mo/Day	2010/01/19		

Nationality of Management:	Chinese
Nationality of owner/owner entity:	Chinese

### Management Gender (enter # of people):

	Male	Female
Managers	20	10
Supervisors	10	3

Nationality of Workers: (Top 5 Countries)	Approx. % of Total Workforce:
Chinese	100%
List ALL other nationalities in the facility:	NA

(Note: If there are North Korean workers in the facility, please additionally provide the following details in the Comments section of the Audit Report:

- Employment dates of each North Korean worker
- Labor agent of each North Korean worker
- Type of work authorization/permission for each North Korean worker

• Summary of Code category violation related to the North Korean workers (detailed info of the Code category violation related to the North Korean workers shall be reported as per the standard reporting process)

### **Audit Details**

Attendance Records Tested:	🗌 Unknown	🛛 April	September
	🗌 None	🗌 May	October
	🛛 January	🗌 June	🛛 November
	February	🗌 July	December
	March	August	
Payroll Ledgers Tested:	🗌 Unknown	🛛 April	September
	🗌 None	🗌 May	October
	🛛 January	🗌 June	🛛 November
	February	🗌 July	December
	🗌 March	August	
Last Pay Date: Year/Mo/Day	2021/05/25	Number of Records Sampled:	20
# Individual Employee Interviews:	10	# Employee Group Interviews:	0
Numbers per Group:			
Additional Locations Audited?	No		
Explain Additional Location Details:			
Comments/Observations:			
Communicated Findings With:	Mr. Luping Li / Ma	anager	
Agreed to and Signed CAPAR?	Yes		
Audit Entered by: (Name)	Snail Zhang		

### **Comments Details**

#### **Comments:**

#### Name and Title of Others Present (ex. translators, observers, trainees): None

Attendance Records Provided: 13 months and 7 days/ May 1, 2020 to June 7, 2021

Payroll Records Provided: 12 months' / May 2020 – April 2021

# of Records Sampled (description): Current: April 2021-10, Random: January 2021-5,

Random: November 2020-5

**Resources Received from Facility (i.e. transportation, meals)**: The facility had provided meal or transportation to auditors and the auditors had paid.

**Factory Representative in opening meeting (name/title):** Mr. Luping Li / Manager, Mr. Shengxiang Wu / Admin Vice Manager, Ms. Hongxia Niu / HR Mnagaer

**Factory Representative in closing meeting (name/title):** Mr. Luping Li / Manager, Mr. Shengxiang Wu / Admin Vice Manager, Ms. Hongxia Niu / HR Mnagaer

(Note: other comments may include but not limit to: details if "Agreed to and signed CAPAR" is indicated "No"; further details regarding audit scope; special observation or comments on the audit process; reason as to why audit report is submitted late; reason as to why auditors assigned in the DDM differ from auditors at site; details of North Korean workers, etc.)

1. This audit was conducted by 2 auditors in one day.

2. The Covid-19 risk of the area the facility located is defined as a low risk by government. Local government does not require companies to adopt the prevention and control measures.

3. There were total of 188 employees worked at the facility. 184 employees were from local Hebei Province, 4 migrant employees were from Henan, Beijing, Chongqing and Shanghai. No foreign employee worked at the facility.

4. This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements

## **Audit Violations**

Child Labor: Acceptable Inverse Inversion N/A Inversion Verify
Predetermined Comments:
Law / Code: Additional Comments: No apparent violation
<b>Other:</b> Acceptable Needs Improvement N/A Unable to Verify
Predetermined Comments:
Law / Code: Additional Comments: No apparent violation
Young Persons:
Predetermined Comments:
Law / Code: Additional Comments: No apparent violation

Association:	Acceptable Deeds Improvement N/A Dunable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation
<u>Coercion and</u> Harassment:	<b>Other:</b> Acceptable Deeds Improvement N/A Durable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation
	Physical Abuse or Sexual Harassment:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation

Compensation:	Minimum Wage:
	Acceptable 🗌 Needs Improvement 🗌 N/A 🗌 Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	<i>Remarks:</i> Local minimum wage standard: (wage per hour or per month): The local minimum wage standard for full-time work was set at RMB 1680 per month equivalent to RMB 9.66 per hour since November 1, 2019.
	Overtime Hours:
	Acceptable 🛛 Needs Improvement 🗌 N/A 🗌 Unable to Verify
	Predetermined Comments: $\square$ Employees work in excess of the legal overtime limit.
	Law / Code: PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.
	<ul> <li>Additional Comments:</li> <li>Auditor noted that overtime hours exceeded the legal requirement. Through document review, auditor noted that:</li> <li>1) The monthly overtime hours of 6 out of 10 randomly selected employees were 42-58 hours in April 2021 (current month).</li> <li>2) The monthly overtime hours of 1 out of 5 randomly selected employees were 56 hours in January 2021 (random month).</li> <li>3) The monthly overtime hours of all 5 randomly selected employees were 40-58 hours in November 2020 (random month).</li> </ul>
	<i>Remarks:</i> Attendance Recorded by: (automated/electronic, timecard, manual, no recording, etc.): Manual
	1. All interviewees during employee interview stated that they worked overtime on voluntary basis.
	2. 13 months' and 7 days' attendance records from May 1, 2020 to June 7, 2021 were reviewed.
	3. According to the attendance records provided by the facility.
	1) For April 2021 (current month), Maximum working hours per week were 58 hours (1 out of 10 selected samples). The maximum monthly overtime hours were 58 hours (1 out of 10 selected samples).
	2) For January 2021 (random month), Maximum working hours per week were 58 hours (1 out of 5 selected samples). The maximum monthly overtime hours were 56
	hours (1 out of 5 selected samples).

3) For November 2020 (random month), Maximum working hours per week were 58 hours (4 out of 5 selected samples). The maximum monthly overtime hours were 58 hours (1 out of 5 selected samples).
<b>Overtime Wage:</b> Acceptable       Needs Improvement       N/A       Unable to Verify
Predetermined Comments:
Law / Code: Additional Comments: No apparent violations
Social Benefits and Other Compensation:
Predetermined Comments: $\square$ Employees are not paid at the time of resignation.*
Law / Code: Hebei Province Provisions on the Payment of Wages Article 18, When an employing entity terminates or dissolves a labour contract with an employee according to law, wages shall be paid to the employee by the employer in a lump sum within 3 days after the labour contract is terminated or dissolved. Wages shall be calculated till the date of termination or dissolution. The economic compensation calculated pursuant to the relevant national regulations shall be paid to the employee simultaneously.
Additional Comments: Auditor noted that delay payment for resigned employees. Through document review, auditor found that the facility rules and actual practices showed that the wages of employee, who had dissolved or terminated his/her labour contract in accordance with the law, were paid on next pay day after termination.
<ul> <li>Do the auditors believe there is potential involuntary labor at the facility? Are there other indicators of involuntary labor?</li> <li>Auditors did not find a potential risk of involuntary labor with this violation. There are no other indicators of involuntary labor.</li> <li>How long has the cited violation existed at the facility?</li> <li>Auditors noted that this violation has existed at the facility for at least 12 months.</li> <li>Process (management/worker interview, document review) and evidence collected and corroborated to sustain the finding and establish the timing of the violation?</li> <li>Auditors noted the issue from document review and it was confirmed through management interviews.</li> </ul>
$\boxtimes$ Employees are not provided with legally mandated benefits.
Law / Code: Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the

employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.
Additional Comments: Auditor noted that insufficient social insurance participated. Through review the social insurance receipt of April 2021, auditor noted that there were 191 employees in the facility, 191 employees (100%) had participated in basic endowment insurance, basic medical insurance, maternity insurance and employment injury insurance, 187 employees (97.9%) had participated in unemployment insurance.
<i>Remarks:</i> Regular Pay Date: 25 <sup>th</sup> of each month
Wage pay in/by (cash, check, direct deposit, etc.): direct deposit

<u>Health and</u> Safety:	Dormitories:         Acceptable       Needs Improvement       N/A       Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Fire & Emergency Safety:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Hazardous Material:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Machine & Electrical Safety:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Medical & First Aid:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Other:

	🗌 Acceptable 🛛 Needs Improvement 🗌 N/A 🗌 Unable to Verify
	Predetermined Comments:
	Law / Code: PRC Law of Prevention and Control of Occupational Diseases Article 26, the employer shall assign dedicated person(s) to carry out day-to-day monitoring of the occupational hazard factors and make sure that the monitoring system is kept in normal working conditions.
	The employer shall, in accordance with the regulations of the public health administration department under the State Council, have the occupational hazard factor(s) tested and evaluated regularly at workplace. The results of testing and evaluation shall be kept in files of occupational health, reported regularly to the public health administration department and announced to the workers. The occupational hazard factor(s) shall be tested and evaluated by the occupational health technical service institutions set up in accordance with the law and authenticated as qualified by the public health administration department under the State Council or the public health administration department under the local government of or above the level of district-constituted municipalities base on their duty. The testing and evaluation made by such institution shall be objective and truthful.
	In case that the occupational hazard factor(s) at workplace do not conform to the national standard and requirements on occupational health, the employer shall immediately adopt appropriate measures to keep them under control. If they still cannot meet the standard or requirements, the operation where such factors exist, shall be stopped. The operation can be resumed only after the factors are kept under control and meet the standards and requirements after the rectification.
	Additional Comments: Audit noted that testing result of occupational hazards factors exceeded standard. During document review, testing report indicated that the factors of occupational disease hazards of ethyl acetate, propyl acetate and butyl acetate in partial positions of printing workshop and compositing workshop exceeded the limit of national standard.
	Personal Protective Equipment (PPE):
	<ul> <li>Predetermined Comments:</li> <li>Employees are not provided with proper Personal Protective Equipment (PPE) or do not wear them properly.</li> </ul>
	Law / Code: PRC on Work Safety Article 42, Production and business entities shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use.
	Additional Comments: Auditor noted that wrong personal protective equipment (PPE) was provided to employees. During facility tour, auditor found that the facility only provided medical mask to printing and compositing employees and did not provide gas mask. (refer to picture #1)
	Sanitation:
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	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation

Involuntary Labor:	Mandatory Overtime:         Image: Second state         Image: Acceptable         Image: Needs Improvement         Image: N/A         Image: Needs Improvement         Image:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	<b>Other:</b> Other:       Acceptable       Needs Improvement       N/A       Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations
	Prison, Bonded, Indentured, Forced Labor:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violations

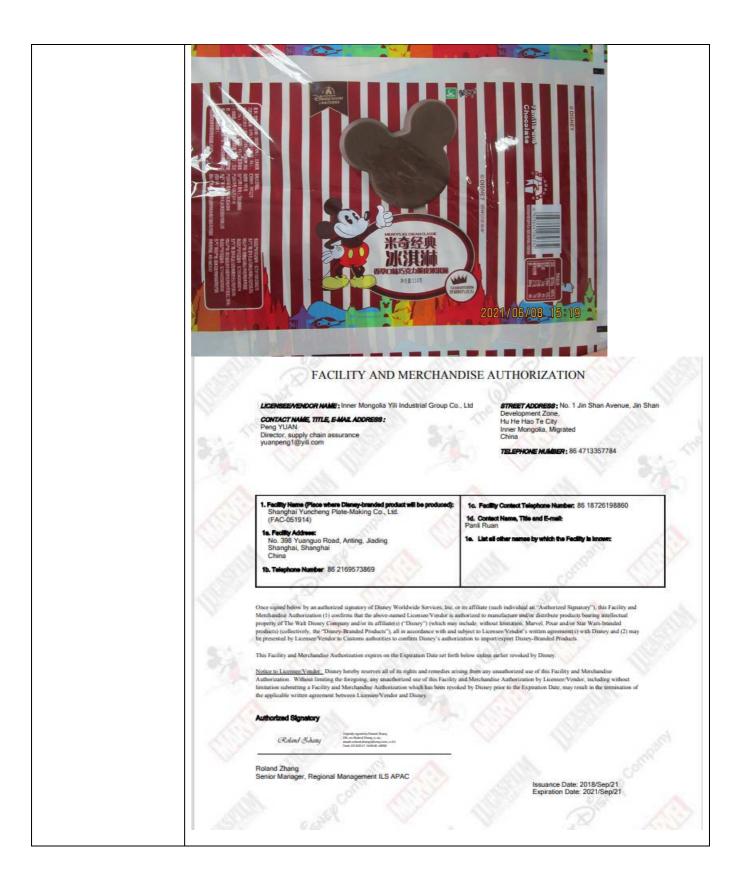
Monitoring and	Ethics:
<u>Compliance:</u>	Acceptable Deeds Improvement N/A Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation.
	Insufficient or Inadequate Records:
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation.
	<b>Other:</b> Acceptable Deeds Improvement N/A Dunable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation.
	<b>Transparency:</b> Acceptable Deeds Improvement N/A Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation.
<u>Non-</u> Discrimination:	Acceptable 🗌 Needs Improvement 🗌 N/A 🗌 Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation.

Other Laws (if applicable):	Labor Contract:       N/A       Unable to Verify         Acceptable       N/A       Unable to Verify         Predetermined Comments:       Acceptable         Law / Code:       Additional Comments: No apparent violation         Additional Comments: No apparent violation         Other:       N/A         Acceptable       N/A         Verify       N/A         Predetermined Comments:       N/A         Acceptable       N/A         Verify       N/A         Acceptable       N/A         Acceptable       N/A         Verify       N/A         Acceptable       N/A         Acceptable       N/A
	Law / Code: Additional Comments: No apparent violation
Protection of the Environment:	<ul> <li>Acceptable Needs Improvement N/A Unable to Verify</li> <li>Predetermined Comments:</li> <li>Acceptable</li> <li>Law / Code:</li> <li>Additional Comments: No apparent violation</li> </ul>

Publication:	Acceptable Deeds Improvement N/A Unable to Verify
	Predetermined Comments:
	Law / Code: Additional Comments: No apparent violation

<ul> <li>Predetermined Comments:</li> <li>Production processes are subcontracted to another facility or another source without Disney's written consent.</li> <li>Law / Code:</li> </ul>
Law / Code:
There's no local law on this requirement. The Disney Code of Conduct: manufacturers should not use subcontractors for the manufacture of Disney merchandise or components thereof without Disney's express written consent, and only after the subcontractor has entered into a written commitment with Disney to comply with this Code of Conduct.
Additional Comments: Auditor confirmed that Xingtai Beiren Printing Co., Ltd. subcontracted Disney- branded production (printing plate with Disney's logo and cartoon pattern) during the past 12 months, the latest subcontracting happened in May 2021. See below details:
<ol> <li>Disney ILS # : FAC-051914</li> <li>This is a Facility;</li> <li>Name: Shanghai Yuncheng Plate-Making Co., Ltd.</li> <li>Full address: No. 398 Yuanguo Road, Anting Town, Jiading District, Shanghai City</li> <li>Contact person's name: Mr. Guo Longlong</li> </ol>
Contact person's phone number: 86-15835958780 Details regarding subcontracted processes or components with Disney intellectual property: printing plate (with Disney's logo and cartoon pattern) The name of Licensee/Vendor for which the product is being manufactured: Inner Mongolia Yili Industrial Group Co., Ltd. Attach the FAMA to the audit report if available: The audited facility had provided the FAMA of the subcontractor Remark: The facility provided the sample of Disney products, purchase order
- t [ i ] / l o S ] i ] l l o o o l i ] / l





#### Appendix:

1. printing employee were wearing medical mask.	2	3
Revenues as-se	(paste photo copy here)	(paste photo copy here)
4	5	6
(paste photo copy here)	(paste photo copy here)	(paste photo copy here)

\*If a PDC with an asterisk (\*) is selected, please provide below additional information for **every** PDC with an asterisk (\*), and report under the appropriate sub-category.

- Do the auditors believe there is potential involuntary labor at the facility? Are there other indicators of involuntary labor?
- How long has the cited violation existed at the facility?
- Process (management/worker interview, document review) and evidence collected and corroborated to sustain the finding and establish the timing of the violation?