

Monitored Party Dongguan Flame Bright Sports Products Limited	amfori ID 156-001835-000	Address Room 301, Building 1#, No. 102, Jinshan Road, Chashan Town, 523000 Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TÜV SÜD
Monitoring Start Date 11/10/2025	Closing Meeting Finished Date 11/10/2025	Submission Date 16/10/2025
Expiration Date 16/10/2026	Announcement Type Semi Announced	
Site Dongguan Flame Bright Sports Products Limited	Site amfori ID 156-001835-002	

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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: Allan Wu; APSCA membership number: CSCA 21700773

Monitoring partner name: TÜV SÜD

Audit schedule details: The audit is planned for one auditor x one day of October 11, 2025.

Announcement Type: Semi Announced

Business partner information:

The audited factory named is Dongguan Flame Bright Sports Products Limited and the Uniform Code of Social Credit No. is 914419006886061656. As shown in business license, the registered address is Room 301, Building 1#, No. 102, Jinshan Road, Chashan Town, Dongguan Guangdong, China.

The factory is established on April 24, 2009. The total construction area is around 1500 square meters. The factory is specialized in the manufacturing of pencil bag and cup bag. The main production processes include cutting, sewing, trimming and packing.

Audited location information:

The factory has occupied the 3rd floor of one 3-storey production building 1# as office, warehouses and cutting / sewing / trimming and packing workshops.

The rest areas are were used by other companies of Dongguan Zhiyuan Sports Equipment Co Ltd, which is producing sports equipment and Dongguan He Li Da Mold Co Ltd., which is producing molds, and the name plates were posted onsite. No exchange of workers among them is found and they are independent from each other, so this audit does not cover the other companies.

No dormitory, kitchen and canteen are provided to the workers.

The building is rented from landlord and the least contract is provided for review.

Operating shifts and hours:

The normal working time is 8 hours per day and 40 hours per week. The regular working days of workers are five days from Monday to Friday. They have one shift for the employees of 8:00-12:00, 13:30-17:30. The maximum daily working time is 10 hours (8 hours regular+2 hours overtime) per day and maximum weekly working time is 54 hours (40 hours regular time + 14 hours overtime). All workers could take at least one day off per week (on Sunday).

The factory has no obvious low and peak season.

Time recording system:

Workers' working time is recorded by electronic attendance system.

Salary payment details:

The workers were paid by hourly rate, the wages were paid on the 30th day of following month by cash The minimum wage is guaranteed. The lowest basic wage is RMB3200 per month, which is higher than the local legal minimum wage requirement of RMB2080 per month since March 2025 and RMB1900 per month before then.

150% and 200% of normal rate were paid for overtime on weekday and rest day respectively, no overtime on statutory holiday. Pay slips are provided so that the workers could understand the composition of their wages. And no illegal deduction is made.

Worker number information:

There are 29 employees working in the factory including 24 production workers (with 12 males and 12 females) and 5 non-production workers including 3 management staff. All employees are permanent employees, and no temporary worker or home worker is identified. There are 22domestic migrants (with 12 males and 10 females) from other province in China. The factory does not have young worker, pregnant worker, seasonal worker, temporary worker, disabled worker, or home-based worker. And they have no other special group workers such as interns, apprentices, contractor workers etc.

Good practices:

None.

Worker organization details:

There is no labor union in the factory, while there are two worker representatives, who are freely elected by the workers.

Circumstances:

- 1, There was no contractor in the factory, so the contractor license or permit was not applicable.
- 2, There was no government waiver in the factory.
- 3, There was no agency labor for the factory, so agency labor contract was not applicable.
- 4, No collective bargaining was carried out before, so collective bargaining agreement was not applicable.
- 5, No inconsistency was found during this audit, so the inconsistencies between time and production records were not applicable.
- 6, No fire permit and structural license of the production building was provided for review.
- 7, There is Personal Information Protection Law in China. Hence, the personal information of employees is removed from the uploaded documents.

Summary of findings:

In this audit, non-compliances are observed in 5 performance areas, please refer to PA1, PA2, PA5, PA6, PA7 for details.

Living wage calculation:

#Living wage, we do not use the data on GLWC website, but the calculation method still follows Anker's methodology. The data were mainly manually collected through local market investigation and worker interview by auditor.

SITE DETAILS

Site

Dongguan Flame Bright Sports Products Limited

Site amfori ID

156-001835-002

GICS Classification

Sector	Industry Group	Industry
Consumer Discretionary	Consumer Durables & Apparel	Textiles, Apparel & Luxury Goods
Sub Industry		
Apparel, Accessories & Luxury Goods		

amfori Process Classifications

Packaging / wrapping / shipping

Sewing / Stitching

Cutting

GS1 Classifications

N.A.

NACE Classification

Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	29	Workers
Legal minimum wage in local currency	2,080	Monthly
Lowest wage paid for regular work at the site	3,200	Monthly
Calculated living wage in local currency	2,057	Monthly
Total sample	5	Workers

Other Metrics

Male workers	15	Workers
Female workers	14	Workers
Non-binary workers	0	Workers
Permanent workers - Male	15	Workers
Permanent workers - Female	14	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	2	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	12	Workers
Domestic migrant workers - Female	10	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	15	Workers
Workers hired directly - Female	14	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 Flame Bright Sports Products Limited | Site amfori ID: 156-001835-002

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	
As per management interview, worker interview, worker representative interview, onsite observation and documents review, the auditee partially met the requirement of this checkpoint: The audited factory had established social compliance management system and related policies and procedures documents were provided for review. And one senior manager was assigned to be responsible for social compliance system, and they had conducted annual internal audit and management review to improve effectiveness of the social performance. However, non-compliance issues were identified in below performance areas of Performance Area 2, P Performance Area 5, Performance Area 6, Performance Area 7, so the social compliance management system was not fully effective. The factory claimed that corrective actions would be conducted against the non-compliances in the audit.	根据管理者访谈、员工访谈、员工代表访谈、现场观察和查看文件，被审核方部分符合该检查点的要求：被审核工厂建立了社会责任的管理体系，并提供了相关政策和程序文件。他们还任命了一名高级经理来负责社会责任体系，并进行每年的内部社会责任审核和管理评审来提高其社会责任绩效。然而，由于其社会责任管理体系在一些执行领域（如执行领域2、执行领域5、执行领域6、执行领域7）还是发现了问题点，所以其社会责任管理体系不是完全有效的。工厂称他们会在这次审核发现的问题点进行整改。

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	
As per management interview, worker interview, worker representative interview, onsite observation and documents review, the auditee partially met the requirement of this checkpoint: The documented workforce planning and production cost calculation management procedure had been defined by the factory, and related production plans were provided for review. However, they did not conduct production cost calculation, and the workforce of the factory was not effectively and properly organized to match delivery order contracts' expectations, so the monthly overtime of employees were over the legal limit of 36 hours.	依据管理者访谈、员工访谈、员工代表访谈、现场观察和文件审核，被审核方部分符合该检查点的要求：被审核工厂制订了产能规划和生产成本核算的书面管理程序，并提供了生产计划供查看。但是，工厂没有进行生产成本核算，其劳动力没有得到有效和适当的组织以满足交付订单合同的期望；因此员工的月加班时间超过了36小时的法规限值。这违背了amfori BSCI的行为准则。工厂称他们会采取整改措施减少加班时间。

Finding

This violated amfori BSCI Code of Conduct. The factory claimed that they would conduct corrective actions to control overtime hours.

PA 2: Workers Involvement and Protection

Site: Dongguan Flame Bright Sports Products Limited | Site amfori ID: 156-001835-002

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

LOCAL LANGUAGE

Finding

As per management interview, worker interview, worker representative interview, documents review and onsite observation, the auditee partially met the requirement of this checkpoint: The grievance mechanism had been set up to handle complaints raised from workers, and all the interviewees claimed that they knew various grievance channels. However, the factory did not carry out satisfaction survey against the grievance mechanism. This violated amfori BSCI Code of Conduct. The factory management claimed that no grievance case was reported recently, while they would take corrective action soon.

根据管理者访谈、员工访谈、员工代表访谈、查看文件和现场观察，被审核方部分符合这个检查点的要求：被审核方建立了处理员工投诉的申诉机制，而且所有的受访员工声称他们都清楚各种申诉的渠道。但是，他们没有对申诉机制进行满意度调查。这违背了amfori BSCI行为准则。工厂管理层称最近没有收到申诉，但是他们会尽快采取整改措施。

PA 5: Fair Remuneration

Site: Dongguan Flame Bright Sports Products Limited | Site amfori ID: 156-001835-002

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

As per management interview, worker interview, worker representative interview and documents review, it was noted that the social insurance coverage of the employees of the auditee was insufficient. The social insurance receipts of August ~ October of 2025 were provided for review, the recent record of October 2025 showed that the coverage of retirement insurance, injury insurance, medical insurance, unemployment insurance and

根据管理者访谈、员工访谈、员工代表访谈和查看记录，发现被审核方的员工的社保覆盖率不足。他们提供了2025年8月-10月的社保凭证，而2025年10月的记录显示养老保险、工伤保险、医疗保险、失业保险和生育保险的覆盖率为14.3%。《中华人民共和国劳动法 第七十二条和第七十三条》这一问题点被判为不符合，原因是有部分员工未参加社会保险，属于管理体系中的系统性缺失。
备注：

Finding

maternity insurances was 14.3%. (Labor Law of the People's Republic of China (1995), Article 72 & Article 73) This finding was rated as NO due to some workers were not covered by social insurance, and it was a systemic deviation existing in the management system.

Remark:

- 1, There was one retired worker, but no newly joined worker, dispatched or temporary worker in the factory. All employees were permanent.
- 2, The factory management claimed that they would like to purchase social insurances for all the employees, while some workers refused to purchase social insurance due to they had purchased rural pension insurance by themselves.
- 3, The factory had purchased group commercial accident insurance for 93.1% of the employees with valid period of September 24, 2025 ~ September 23, 2026.

1, 工厂有一名退休员工,但是没有新进员工、派遣工和临时工。所有的员工都是固定工。

2, 工厂管理层称愿意为所有员工购买社保,但部分工人不愿意购买社保,因为他们已经自行购买了农保。

3, 工厂给93.1%的员工购买了集体商业意外险,有效期为2025年9月24日-2026年9月23日。

PA 6: Decent Working Hours

Site: Dongguan Flame Bright Sports Products Limited | Site amfori ID: 156-001835-002

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

As per management interview, worker interview, worker representative interview and time records review, the employees of auditee had excessive monthly overtime. The time records of five sampled employees from Production dept. in March 2025, June 2025 and August 2025 were selected as samples from the time records of recent one year. The factory sometimes arranged 2 hours overtime on working days and 8 hours overtime on Saturday. Per document review, management / worker interview, all the overtime work was arranged on voluntary basis. However, it was noted that all the sampled employees' monthly overtime hours had exceeded the legal limit in all the sampled months, the maximum monthly overtime were up to 56 hours in March 2025, 46 hours in June 2025 and 56 hours in August 2025. (Labor Law of the People's Republic of China (1995), Article 41.) The management claimed that they had urgent

根据管理者访谈、员工访谈、员工代表访谈和查看考勤记录,被审核方的员工有加班超时的情况。在提供的最近一年的考勤记录中,审核员抽选了五名来自生产部的员工在2025年3月、2025年6月和2025年8月的考勤记录。工厂有时在工作日安排2小时加班,在周六安排8小时加班。根据文件审核,管理访谈和员工访谈,所有加班都是自愿安排的。但是,全部抽样员工在所有的抽样月份中月加班时间超过了法规限值,最高月加班在2025年3月为56小时,在2025年6月为46小时,在2025年8月为56小时。《中华人民共和国劳动法 第四十一条》管理层称他们有紧急订单,而且工人数量不足。这一问题被判为不符合,因为审核发现全部抽样员工在抽样月份中都有加班时间过长的情况,工时管理制度存在系统性缺失。

Finding

production orders, and the employees were insufficient. This finding was rated as NO due to all the sampled workers had excessive overtime working hours in the sampled months, and it is a systemic deviation existing in the working hours management system.

PA 7: Occupational Health and Safety

Site: Dongguan Flame Bright Sports Products Limited | Site amfori ID: 156-001835-002

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

ENGLISH

LOCAL LANGUAGE

Finding

As per management interview, worker interview, worker representative interview, document review and site observation, the auditee partially met the requirement of this checkpoint: The Occupational Health and Safety management procedure had been set up by the audited factory as per requirements of amfori BSCI Code of Conduct and local laws / regulations, and the factory had collected and updated OHS laws / regulations regularly. However, below non-compliance issues had been found in this Performance Area, so the effectiveness of OHS management system was insufficient.

根据管理人员访谈、员工访谈、员工代表访谈、文件查看及现场走访，被审核方部分符合该条款：被审核方按照amfori BSCI行为准则和当地法律法规的要求建立了职业健康安全的管理程序，他们还定期收集和更新职业健康与安全相关的法律法规。然而，在本执行领域发现了以下问题点，因此其职业健康安全管理体系的有效性是不足的。

Question: 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH

LOCAL LANGUAGE

Finding

As per management interview, worker interview, worker representative interview, document review and onsite observation, the auditee partially met the requirement of this checkpoint: The auditee had established Personal Protective Equipment usage management procedure, and they had provided PPE to workers free of charge. However, one cutting worker was not wearing earplugs as per requirement in the cutting workshop. (PRC Work Safety Law (2002), Amendment (2014), Article 42)

根据管理者访谈、员工访谈、员工代表访谈、查看文件和现场观察，被审核方部分符合该条款的要求：被审核方建立了劳动保护用品使用的管理程序，并给员工免费提供了劳保用品。但是，在裁床车间发现一名裁床工人没有按要求佩戴耳塞。（《中华人民共和国安全生产法 第四十二条》）管理层称他们会要求员工上班的时候佩戴好劳保用品。

Finding	
The management claimed that they would require the workers to wear PPE properly during working hours.	

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	
According to management interview, worker interview, worker representative interview, documents review and onsite observation, the auditee partially met the requirement of this checkpoint: The production building was safe and stable as per site observation. However, the factory did not provide the Completion of Construction Proof of Inspection, and fire license or fire registration document for the production building for review. (PRC Fire Protection Law (1998) Amendment (2009), Article 13 & PRC Construction Law (1998), Amendment (2011), Article 61) The factory claimed that they had no idea when the building was built, and they could not provide structural integrity inspection report for the building issued by qualified third party company and inspection report on fire facilities issued by qualified third party. The factory management claimed the building owner could not provide the documents.	根据管理者访谈、员工访谈、员工代表访谈、查看文件和现场观察，工厂部分符合该条款：通过观察厂内建筑是安全稳固的。但是，工厂没有提供其所在生产楼的竣工验收报告，消防验收报告或消防备案文件。 《中华人民共和国消防法 第十三条 和 中华人民共和国建筑法（1998年）修正案（2019年）第61条》 工厂称不清楚该建筑是什么时候建成的，另外没有提供第三方公司出具的结构安全性检测评估报告，也没有第三方机构出具的消防设施检查报告。工厂管理层称房东未能提供这些文件。