

Responsible Sourcing Workplace Assessment Report + Enhanced Management Systems & Environment



Prepared for: [REDACTED]

Assessment Date(s): 3/8/2022

Supplier Profile

Client Supplier ID:	[REDACTED]	Supplier Name (Local Language):	Not provided
Supplier Name:	[REDACTED]		
Supplier Contact Name:	[REDACTED]		
Supplier Phone:	[REDACTED]		
Supplier Fax:	Not provided		
Supplier Email:	[REDACTED]		

Current Assessment Profile

Facility Name:	Wuhan Zonsen Medical Products Co.,Ltd	Business Line:	Store Brand
Report Number:	611145	Assessment Start Time:	8:50am
Assessment Result/Grade:	Low Risk	Assessment End Time:	4:30pm
Assessment Type:	Re-Audit	Name of Auditor or Assessor (Lead):	Kenny Zhang CSCA 21702476
Is this assessment date announced or not?	Announced with window	Name of Auditors or Assessors (Team):	None
Assessment Start Date:	3/8/2022	Other Parties Involved in Assessment:	None

RESPONSIBLE SOURCING WORKPLACE ASSESSMENT REPORT

Facility Name: Wuhan Zonsen Medical Products Co.,Ltd

Audited On: 3/8/2022

Assessment End Date:	3/8/2022	Report Author:	Kenny Zhang CSCA 21702476
Number of Person Days:	1		
Grading Matrix Used:	Client Specific	Original RSWA Question Set Modified?	Yes

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1. Assessment Overview

1.1 Summary of Activities

Opening Meeting:

Upon arrival to the facility, the auditor (Kenny Zhang) was greeted by Ku Youhua/ Manager and escorted to the meeting room where an opening meeting was conducted with Ku Youhua/ Manager and Li Xudong/General Manager. The assessment procedures, grading criteria and UL Statement of Integrity were explained, and the UL Statement of Integrity was signed by a facility representative. Access to employees, facility and documentation was fully granted.

Facility management allowed the auditor (Kenny Zhang) to take photos during the assessment.

Facility Walkthrough:

A health and safety walkthrough was facilitated by Ku Youhua/ Manager which provided an overview of the facility work floor and employee interaction with each other and with the management team.

The auditor (Kenny Zhang) assessed the following facility areas:

- There are three 4-storey buildings, five flat buildings and two 2-storey buildings within the compound. The facility only occupied the two 4-storey production buildings (#2 and #3). For production building #2, the first floor is used as office, finished goods warehouse and material warehouse, the second floor is used as wet wipes production line and packing section, the third floor is used as disinfection cotton piece production line and packing section, the fourth floor is used as planar masks production line and packing section. For the production building #3, the first floor is used as material warehouse, the second floor is used as special-shaped mask production line and packing section, the third floor is used as warehouse, the fourth floor is used as dry wipes production line and packing section. The other buildings are rented by other two factories which named "Wuhan Senkai Automation Equipment Co., Ltd." and "Wuhan Xiezhuo Sanitary Products Co., Ltd", based on the facility walkthrough, employee interview and document review, these factories have independent business license, and there is physical separation from each other, no employee or production is shared. Thus, the other two factories are not included in the current assessment.
- No dormitory or canteen is provided to employees.

The auditor (Kenny Zhang) sampled:

- All production areas. At least two fire alarms, two fire hydrants, two evacuation plot plans, two emergency exits, two exit signs, two emergency lights, two electrical control panels, one first aid kit and four fire extinguishers were checked on each work floor.

Documentation Review:

After the walkthrough, facility management provided access to facility Environmental, Health and Safety (EHS) documentation. The following EHS documentation was reviewed:

- Fire license, First aider certificate, Fire drill, training records, and fire equipment inspection records, Production equipment list, records for inspection and maintenance of special equipment, annual inspection records and use permits for all types of special equipment (such as annual elevator safety inspection records), permits for employees engaged in the use of special equipment, Health and safety training records, injury records, employee user manual, supplier chain management procedures and so on.

Furthermore, a payroll assessment was conducted and one full year of payroll and time records were made available for the review and facilitated by Ku Youhua/ Manager and Li Xudong/General Manager. As part of the payroll review, auditor (Kenny Zhang) requested and was provided with three payroll periods as the sample for the payroll assessment. In each period, 10 employees were sampled.

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The reviewed payroll records consisted of 10 finger swiping records payroll records issued to 10 hourly employees, as well as paid leave. Payroll register displayed employee name, weekending date, all regular and overtime hours worked, hourly rates, earnings, additions/deductions, net and gross earnings.

In addition to payroll and time records, the following records were also reviewed:

- Employee personal files and labor contract, employee handbook, facility regulation and rules, injury dealing procedures, social insurance receipts.
- Business license.

Employee Interviews:

The day on which the employee interviews were conducted, a total of 65 employees were present. A sample of 10 employees was selected to include 5 males and 5 females from different sections.

Closing Meeting:

At the conclusion of the assessment a closing meeting was conducted with Ku Youhua/ Manager and Li Xudong/General Manager. The assessment outcome was communicated and reviewed in detail through presenting the Summary of Findings. The Summary of Findings was signed by Li Xudong/General Manager. Assessment team thanked the meeting participants for their time, cooperation and assistance with the assessment process. The assessment was concluded at 4:30pm.

1.2 Facility Risk Rating and Performance

Table 1: Current and previous assessment information:

Current Assessment		Previous Assessment	
Assessment Date:	3/8/2022	Assessment Date:	10/18/2021
Assessment Result/Grade:	Low Risk	Assessment Result/Grade:	High Risk
Assessment Type:	Re-Audit	Assessment Type:	Initial Onsite
		Previous assessment completed by UL:	Yes

Table 2: Number and type of findings in current assessment:

	Number of Findings	Low Risk	Intermediate Risk	High Risk	Critical Risk	Alert Notification	Zero Tolerance	Law	Code of Conduct	Int'l Standard/ Min. Recommendation
Facility Profile	0	0	0	0	0	0	0	0	0	0
Management Systems	0	0	0	0	0	0	0	0	0	0
Labor	0	0	0	0	0	0	0	0	0	0
Wages & Hours	2	1	1	0	0	0	0	2	0	0
Health & Safety	5	1	4	0	0	0	0	4	0	1
Environment	2	0	2	0	0	0	0	2	0	0

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Totals	9	2	7	0	0	0	0	8	0	1
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Table 3: Overview of listed findings in current assessment:

Category	Subcategory	Finding Statement	Grade	Standard
Wages & Hours	Benefits	Social insurance not provided - China only (with or without valid social insurance waiver)	Low	Law
Wages & Hours	Overtime Hours	Overtime working hours not in compliance with law (less than two times the country limit)	Intermediate	Law
Health & Safety	Emergency Exits	Emergency exit doors do not open in direction of travel	Intermediate	Law
Health & Safety	Emergency Exits	Emergency exits (doors and windows) not designated with a visible sign	Intermediate	Law
Health & Safety	Evacuation plan	No "You Are Here" mark on evacuation plans	Low	Minimum Recommendation
Health & Safety	First Aid - Medical tests	No legally required medical testing (e.g. hearing test)	Intermediate	Law
Health & Safety	Risk Assessment and Management	No legally required risk assessment and or management	Intermediate	Law
Environment	Hazardous Waste	No policy or system to manage hazardous waste inventory or control	Intermediate	Law
Environment	Licenses/ Permits/ Certifications	No policy or system to identify or maintain environmental permits/ licenses/ certifications	Intermediate	Law

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2. Facility Profile

2.0.1	Facility Name:	Wuhan Zonsen Medical Products Co.,Ltd
2.0.2	Facility Name in Local Language:	武汉中森医疗用品有限公司
2.0.3	Facility Address:	No.8 Jinchao Road, Zhucheng Avenue, Xinzhou District, 431400, Wuhan, Hubei, China
2.0.4	Facility Address in Local Language:	中国湖北省武汉市新洲区郑城街金巢路 8 号
2.0.5	Facility Contact Name who assisted with assessment:	Tian Haiying/ Li Junxia
2.0.6	Facility Phone:	86-18321637751/ 86-17371444705
2.0.7	Facility Fax:	Not provided
2.0.8	Facility Email:	sales09@zonsenmed.com/ lijx@zonsenmed.com
2.0.9	Facility Reported Owner or Operations Manager:	Mr. Li Xudong/ General Manager
2.0.10	Facility Reported Number of Years Operating out of Assessed Location:	Since 2014

2.1 Facility Access

2.1.0	Can you access the facility?	Yes
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2.2 Certifications

2.2.0	Valid certifications or stakeholder initiative participation:	N/A
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2.3 Production Profile

2.3.1	Industry sector:	Medical products
2.3.2	Principal products:	Wet wipes, wipe pieces, non-woven products, etc.
2.3.3	Production capacity per month:	Masks: 20,000,000 pcs; wet wipes: 600,000 pcs; dry wipes: 500,000 pcs; wipes: 10,000,000 pcs
2.3.4	% of total production for client:	0
2.3.5	% of total production for other current clients:	100%
2.3.6	Labels viewed on production floor:	None
2.3.7	Is the facility operating at full capacity?	Yes

2.4 Personnel Profile

2.4.1	Total number of employees (excl. contracted employees):	66
2.4.1.a	total male	31
2.4.1.b	total female	35
2.4.1.c	permanent	66
2.4.1.d	temporary (facility direct hire)	0
2.4.1.e	part-time (facility direct hire)	0
2.4.1.f	night	0
2.4.1.g	pregnant	0
2.4.1.h	on maternity leave	0
2.4.1.i	piece-rate	0
2.4.1.j	salaried	0
2.4.1.k	hourly paid	66

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2. Facility Profile

2.4.1.l	homeworkers	0
2.4.1.m	apprentice / trainees	0
2.4.1.n	employees under the age of 18	0
2.4.1.o	foreign imported/ foreign migrant	0
2.4.1.p	hired by the facility through labor brokers	0
2.4.1.q	contracted employees working in production	0
2.4.1.r	contracted employees indirectly related to production (e.g. security, maintenance)	0
2.4.1.s	age youngest employee:	22
2.4.1.t	nationalities of the employees:	Chinese
2.4.1.u	employee turnover rate of facility direct hires:	5%
2.4.1.v	employee absenteeism by gender of facility direct hires:	Not provided

2.5 License

2.5.1	Does the facility possess a business license?	Yes
2.5.2	Is the business license maintained and posted in accordance with applicable standards?	Yes

2.6 Labor Disputes

2.6.1	Has the facility been free of any public labor disputes (e.g. strike, demonstration) in the last 2 years?	N/A
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2.7 Community Engagement

2.7.1	Does the facility support its community through any type of engagement?	N/A
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2.8 CVS E-Learning

2.8.1	Did the facility complete the CVS Responsible Subcontracting (CVS e-learning is an annual requirement and must be completed annually)?	Yes, proof provided during opening meeting.
2.8.2	Did the facility complete the ELEVATE - Fire Safety (CVS e-learning is an annual requirement and must be completed annually)?	Yes, proof provided during opening meeting.

2.9 Facility Double High Risk

2.9.1	Has the facility received two High Risk grades in two consecutive audits?	No, facility has not received two High Risk grades in two consecutive audits.
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3. Facility Supply Chain Profile

3.1 Subcontracting

3.1.1	Does the primary facility utilize Tier 1 subcontractors? Tier 1 subcontractor defined as: Subcontractors of the Primary Facility producing finished merchandise where substantial manufacturing occurs to render the product a finished item, including major components and/or individual products packaged together as part of a kit.	No, primary facility does not utilize Tier 1 subcontractor The factory has never received CVS order yet.
3.1.2	Does the primary facility utilize Tier 4 subcontractors for further handling of merchandise containing CVS branded logos, distributed by CVS statements, distributed by Advanced Healthcare statements or any other references to CVS?	No, primary facility does not utilize Tier 4 subcontractor for further handling of merchandise Remark: The factory has never received CVS order yet. Based on the statement of facility management, there was no CVS order currently. The final product they will produce for CVS is wet tissue, no client logo will be printed in this product.
3.1.3	Does the primary facility utilize Tier 4 subcontractors for producing packaging materials containing any CVS branded logos, distributed by CVS statements, distributed by Advanced Healthcare statements or any other references to CVS?	Yes, primary facility will utilize Tier 4 subcontractor for the production of packaging materials. Remark: The factory has never received CVS order yet. The facility management stated that they had designed the sample of packing material for client review and will be confirmed in future. The CVS logo will be printed in packaging material if this sample is approved.
3.1.3.a	Tier 4 Subcontractor Facility name (1):	Dongguan Hexin Packing Products CO., Ltd
3.1.3.b	Describe subcontracted process:	Providing packing bag of wet tissue to the primary facility
3.1.3.c	Contact person(s):	Ms. Chen
3.1.3.d	Address:	Changlong Village, Huangjiang Town, Dongguan, Guangdong, China
3.1.3.e	Phone:	0769-87131128
3.1.3.f	Email:	Not provided
3.1.4	Does the primary facility put the product into the final point of purchase packaging containing any CVS branded logos, distributed by CVS statements, distributed by Advanced Healthcare statements or any other references to CVS?	Yes, the primary facility will put the product into the final point of purchase packaging, if the sample of packing bags is approved by the client.
3.1.5	Facility personnel in charge of subcontractor disclosure:	Mr. Ku Youhua/ Manager
3.2 Contractors		
3.2.1	The facility does not use contractors.	Yes
3.3 Homeworkers		
3.3.1	The facility does not use homeworkers.	Yes

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3. Facility Supply Chain Profile

3.4 Governance

3.4.1	Are applicable standards (e.g. facility, client, legal) communicated to facility's suppliers, subcontractors, contractors, customers and partners?	Yes
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3.5 Risk Assessment

3.5.1	Has the facility conducted a supply chain risk assessment to identify suppliers, subcontractors, contractors, customers and partners who constitute a risk to the facility?	N/A
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3.6 Auditing

3.6.1	Does the facility audit its suppliers, subcontractors, contractors, customers and partners?	Yes
3.6.1.a	Does the facility keep records of the supply chain monitoring activity?	Yes

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4. Management Systems		
4.1 Certifications		
4.1.1	Does the facility have valid management systems certifications?	N/A
4.2 Governance		
4.2.1	Has the facility established policies/ codes governing labor, grievances, health and safety, environment, and ethics and business integrity?	Yes
4.2.1.a	Do documents exist demonstrating executive management support of policies?	Yes
4.2.1.b	Does the facility have a documented system to annually review and modify facility's policies/ codes?	Yes
4.2.1.c	Are policies made available to the public?	Yes
4.3 Compliance		
4.3.1	Has the facility implemented a mechanism that identifies, keeps up to date and alerts applicable personnel of all standards (e.g. legal, client) that the facility must comply with?	Yes
4.4 Responsibility		
4.4.1	Does the facility have in place management personnel to implement the facility's policies, client specific requirements and legal requirements in the areas of labor, grievances, health and safety, environment, and ethics and business integrity?	N/A
4.5 Education		
4.5.1	Does the facility communicate and train employees (all levels) on the facility's policies, client specific requirements and legal requirements in the areas of labor, grievances, health and safety, environment, ethics and business integrity?	Yes
4.6 Performance		
4.6.1	Has the facility identified performance objectives related to labor, grievances, health and safety, environment, and ethics and business integrity?	N/A
4.7 Grievance Mechanism		
4.7.1	Does the facility maintain a grievance procedure by which employees can confidentially raise issues of concern to management without fear of reprisal or negative repercussions?	Yes
4.7.1.a	Has the facility implemented a procedure to record, track, and communicate progress and individuals responsible for each grievance item reported to the facility?	Yes
4.8 Other		
4.8.1	Are any other management systems practices (not already covered in this section) in accordance with applicable standards?	Yes

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5. Labor		
5.1 Postings		
5.1.1	Are labor-related notices posted in language(s) understood by employees and in accordance with other applicable standards?	Yes
5.2 Privacy		
5.2.1	Does the facility maintain privacy of employee's records by keeping employees' personal data confidential and limiting access to such data to authorized staff?	Yes
5.3 Hiring & Termination		
5.3.1	Are employees aware of their employment terms in accordance with applicable standards?	Yes
5.3.2	Does the facility provide employees with a document that outlines the employment terms in accordance with applicable standards?	Yes
5.3.2.a	Does the facility keep and maintain the written employment terms in accordance with applicable standards?	Yes
5.3.2.b	Does the content of the document that outlines the employment terms correspond to employee testimony and meet applicable standards?	Yes
5.3.2.c	Is the written document that outlines the employment terms in a language understood by each respective employee?	Yes
5.3.3	Is employee classification (e.g. salaried, temporary, apprentice) in accordance with applicable standards?	Yes
5.3.4	Are employee probation periods in accordance with applicable standards?	Yes
5.3.5	Does the facility maintain documentation that indicates employees' eligibility to work in accordance with applicable standards?	Yes
5.3.6	Does the facility request original, legal documentation to verify the employee's age at the time of hire?	Yes
5.3.6.a	Does the facility have a process to identify the validity of that legal documentation?	Yes
5.3.6.b	Are copies of legal documentation kept and maintained in accordance with applicable standards?	Yes
5.3.7	Is termination of employment and maintenance of termination records executed in accordance with applicable standards?	Yes
5.3.8	Are any other hiring and termination practices (not already covered in this section) in accordance with applicable standards?	Yes
5.4 Remuneration		
5.4.1	Does the facility maintain payroll records?	Yes
5.4.1.a	Payroll period(s) reviewed for assessment sample:	November 2021 to January 2022
5.4.1.b	Are reviewed payroll records maintained in accordance with applicable standards?	Yes

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5. Labor

		<p>Previously, the payroll journals were improperly itemized, missing the payment date. Based on the interview, wages were issued before 20th of current month for previous month and no delay.</p> <p>Currently, the payment date is listed on wage records.</p>
5.4.2	Does the facility maintain records on production output for employees who are e.g. paid by piece or task in accordance with applicable standards?	N/A There is no employee paid by piece rate.
5.4.3	Does the information in reviewed payroll records, records on production output and interviews correspond?	Yes
5.4.4	Is the legal minimum wage guaranteed to employees in accordance with applicable standards?	Yes
5.4.5	Lowest legal regular hourly rate (USD conversion)	RMB 10.34 (USD 1.62)
5.4.6	Highest regular hourly rate paid by the facility (USD conversion)	RMB 18 (USD 2.82)
5.4.7	Lowest regular hourly rate paid by the facility (USD conversion)	RMB 18 (USD 2.82)
5.4.8	Average regular hourly rate paid by the facility (USD conversion)	RMB 18 (USD 2.82)
5.4.9	Average rate of pay (regular and overtime) per legal pay period paid by the facility (USD conversion)	RMB 4627.8 (USD 725.36)
5.4.10	Are employees compensated at the rate dictated by the applicable standard based on their classification (e.g. salaried employee, temporary, apprentice)?	Yes
5.4.11	Are employees paid for "down time" in accordance with applicable standards?	Yes
5.4.12	For piece rate workers, is production quota determined through a government study, time and motion study, or other study?	N/A There is no employee paid by piece rate.
5.4.13	Is the payment method in accordance with applicable standards?	Yes
5.4.14	Are wages paid directly to the employee or an employee-controlled account?	Yes
5.4.15	Is the wage policy, such as pay date and pay rates, communicated to employees?	Yes
5.4.16	Is the pay frequency in accordance with applicable standards?	Yes
5.4.17	Is the time of payment in accordance with applicable standards?	Yes
5.4.18	Is overtime paid in accordance with applicable standards?	Yes
5.4.19	Does the facility provide employees with an understandable wage statement that, at minimum, includes regular and overtime hours worked, regular and overtime earnings, and deductions in accordance with applicable standards?	Yes
5.4.20	Are deductions from employee wages in accordance with applicable standards?	Yes

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5.4.21	Are employees provided equipment used in the process of employment (e.g. tools, uniforms, PPE) paid for by the facility in accordance with applicable standards?	Yes
5.4.22	Are any other remuneration practices (not already covered in this section) in accordance with applicable standards?	Yes

5.5 Benefits

5.5.1	Do employees receive additional remuneration (e.g. bonuses, incentives, allowances)?	Yes
5.5.2	Do employees receive applicable benefits in accordance with applicable standards?	<p>No</p> <p>Recurring finding: Previously, insufficient social insurance coverage was detected. There were 59 employees in the facility currently. However, as per the provided social insurance records of October 2021, only 52 out of them participated with retirement insurance, unemployment insurance, child-bearing insurance, medical insurance and injury insurance.</p> <p>Currently, insufficient social insurance coverage is detected. 64 employees shall be provided with social insurance currently. However, as per the provided social insurance records of February 2022, 57 of them participated with retirement insurance, unemployment insurance, child-bearing insurance, medical insurance and injury insurance.</p> <p>China Social Insurance Law, Article 10, 23, 33, 44, 53</p>
5.5.3	Do employees receive non-monetary benefits not required by applicable standards?	Yes

5.6 Working Hours

5.6.1	Standard hours of operation	8:00 AM-12:00 PM, 1:00 PM-5:00 PM
5.6.2	Number and duration of breaks during work day	Once, 1 hour
5.6.3	Does the facility maintain time records?	Yes
5.6.3.a	Time record period(s) reviewed for assessment sample:	November 2021 to January 2022
5.6.3.b	Are time records maintained in accordance with applicable standards?	Yes
5.6.4	Are employees working regular working hours (daily, weekly, monthly, other) in accordance with applicable standards?	Yes
5.6.5	Highest number of regular hours per week permitted under law	40
5.6.6	Highest number of regular hours per week worked at the facility	40

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5. Labor

5.6.7	Lowest number of regular hours per week worked at the facility	40
5.6.8	Average number of regular hours per week worked at the facility	40
5.6.9	Are employees working overtime hours (daily, weekly, monthly, other) in accordance with applicable standards?	<p>No</p> <p>Previously, excessive monthly overtime was detected for 70% of sampled employees in June 2021, August 2021, September 2021 and 100% of sampled employees in July 2021, with the maximum up to 107 hours, 110 hours, 103 hours and 121 hours respectively.</p> <p>Currently, excessive monthly overtime was still detected, but the maximum is within two times of legal limit.</p> <p>New finding: Monthly overtime exceeding 36 hours are detected for all sampled employees from November 2021 to January 2022, up to 70, 68 and 54 hours respectively.</p> <p>PRC Labor Act (1995), Article 41</p>
5.6.10	Does the facility have an overtime waiver in accordance with applicable standards?	<p>N/A</p> <p>The facility did not maintain an overtime waiver currently.</p>
5.6.11	Highest number of daily overtime hours permitted under law:	3
5.6.12	Highest number of daily overtime hours worked at the facility:	2
5.6.13	Highest number of overtime hours per week permitted under law:	N/A
5.6.14	Highest number of overtime hours per week worked at the facility:	18
5.6.15	Lowest number of overtime hours per week worked at the facility:	16
5.6.16	Average number of overtime hours per week worked at the facility:	17
5.6.17	Highest number of monthly overtime hours permitted under law:	36
5.6.18	Highest number of monthly overtime hours worked at the facility:	70
5.6.19	Are employees informed about and understand overtime obligations prior to employment and prior to working the overtime shift?	Yes
5.6.20	Do employees receive rest breaks during the day in accordance with applicable standards?	Yes
5.6.21	Do employees receive daily rest in accordance with applicable standards?	Yes

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5. Labor		
5.6.22	Do employees receive weekly rest in accordance with applicable standards?	Yes
5.6.23	Maximum number of consecutive days worked permitted by law:	12
5.6.24	Maximum number of consecutive days worked at the facility:	6
5.6.25	Does the facility prevent employees from taking work home to finish the task or quota?	Yes
5.6.26	Does the facility follow provisions on the number of women's working hours in accordance with applicable standards?	Yes
5.6.27	Are any other working hour practices (not already covered in this section) in accordance with applicable standards?	Yes
5.7 Forced, Bonded, Indentured, Slave, Prison Labor		
5.7.1	Do actual employment terms meet the job expectations promised at time of recruitment?	Yes
5.7.2	Are employees free from paying charges for the purpose of recruitment or employment, including fees (e.g. recruitment, transportation), taxes, deposits or bonds (e.g. training bond)?	Yes
5.7.3	Are employees free of debt due to recruitment or employment?	Yes
5.7.4	Do employees maintain custody of their original documents (e.g. passport, work permit, birth certification, official ID card, driver's license, family record book)?	Yes
5.7.5	Are employees free to resign employment in accordance with applicable standards?	Yes
5.7.6	Are employees free from threats of illegal terminations (e.g. threats of repatriation for foreign workers)?	Yes
5.7.7	Are employees guaranteed freedom of movement during and after working hours?	Yes
5.7.8	Does the facility avoid withholding wages or requiring deposits of any kind during the employment relationship in accordance with applicable standards?	Yes
5.7.9	Are employees free from daily production quota requirements prior to leaving the facility?	Yes
5.7.10	Do employees voluntarily agree to overtime and is mandatory overtime administered in accordance with applicable standards?	Yes
5.7.11	Is mandatory overtime permitted by law?	No Mandatory overtime is not permitted in China.
5.7.12	Does the facility avoid involving convicts in its production processes (not limited to processes of client)?	Yes
5.7.13	Does the facility avoid any other abusive employment practices (not already covered in this section) that are not in accordance with applicable standards?	Yes
5.8 Child Labor, Young Workers, Apprentices/Trainees		
5.8.1	Facility minimum hiring age standard (yrs):	16
5.8.2	Are employees currently employed at an age in accordance with applicable standards?	Yes

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5. Labor

5.8.3	At the time of hire, was the age in accordance with applicable standards?	Yes
5.8.4	Are working conditions (e.g. task, hours) for employees under the age of 18 in accordance with applicable standards?	N/A There is no employee under the age of 18 employed in the facility currently.
5.8.5	Are required medical tests before and during employment conducted for employees under the age of 18 in accordance with applicable standards?	N/A There is no employee under the age of 18 employed in the facility currently.
5.8.6	Does the facility maintain permits, licenses, parental consent forms and other documents related to the employment of apprentices, trainees and employees under the age of 18 in accordance with applicable standards?	N/A There is no employee under the age of 18 employed in the facility currently.
5.8.7	Are identified apprenticeship/ traineeships administered by the facility in accordance with applicable standards?	N/A There is no apprentice/ trainee in the facility currently.
5.8.8	Does the facility have a system in place to remediate situations where an employee is discovered to have not been hired in accordance with applicable standards on minimum age?	Yes
5.8.9	Are any other child, young worker, apprentice, and trainee employment practices (not already covered in this section) in accordance with applicable standards?	Yes

5.9 Abuse, Coercion, Harassment, Disciplinary Action

5.9.1	Are employees free from any form of abuse, harassment, coercion or corporal punishment?	Yes
5.9.2	Are employees free from pressure, coercion, or threats by any means to maintain them in employment?	Yes
5.9.3	Were employees free from pressure, coercion, or threats by any means during recruitment?	Yes
5.9.4	Does the facility maintain procedures on disciplinary action?	Yes
5.9.5	Are disciplinary practices administered in accordance with applicable standards?	Yes
5.9.6	Are security practices administered in accordance with applicable standards?	Yes
5.9.6	Are behavior practices administered in accordance with applicable standards towards any person on facility grounds?	Yes
5.9.7	Are any other disciplinary-related practices (not already covered in this section) in accordance with applicable standards?	Yes

5.10 Discrimination

5.10.1	Are employees free from discrimination in accordance with applicable standards?	Yes
5.10.2	Are tests (e.g. medical, aptitude) executed for hire/ recruitment in accordance with applicable standards?	Yes
5.10.3	Does the facility maintain procedures to prohibit and prevent discriminatory practices?	Yes

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5. Labor

5.10.4	Are employees hired and maintained in employment regardless of pregnancy status or marital status?	Yes
5.10.5	Is birth control forbidden as a condition for hiring and maintaining employment?	Yes
5.10.6	Does the facility follow provisions on women's employment terms during pregnancy, maternity leave and return from maternity leave in accordance with applicable standards?	Yes
5.10.7	Does the facility accommodate the beliefs of employees (e.g. head dress, prayer breaks) as far as practicable?	Yes
5.11 Freedom of Association and Collective Bargaining		
5.11.1	Are employees free to associate and collectively bargain in accordance with applicable standards	Yes
5.11.2	Where the ability to associate and collectively bargain are legally restricted, do employees have access to alternative means in accordance with applicable standards?	Yes
5.11.3	Are employees members of a union?	No
5.11.4	Are employees subject to a collective bargaining agreement?	No
5.11.5	Are employees members of a workers' organization?	No
5.11.6	Do employees have any worker representation apart from unions or workers' organizations?	Yes
5.11.7	Are activities (e.g. elections, meetings) associated with workers' representation (union, workers' organization and other representation) permitted by the facility in accordance with applicable standards?	Yes
5.11.8	Are any other freedom of association and collective bargaining practices (not already covered in this section) in accordance with applicable standards?	Yes

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6. Health & Safety

6.1 Licenses/Permits/Certifications

6.1.1	Is the facility in possession of H&S permits, licenses and/or certifications that are current and in accordance with applicable standards?	Yes
6.1.2	Is the facility in possession of forklift, boiler, generator, lift (elevator), compressor, pressure vessel, crane, and industrial refrigerator permits, licenses and/or certifications that are current and in accordance with applicable standards?	Yes
6.1.3	Does the facility maintain forklift driver, boiler, lift (elevator), crane, pressure vessel operator licenses in accordance with applicable standards?	<p>Yes</p> <p>Previously, the facility did not provide the operator permits for one out of two forklift drivers.</p> <p>Currently, all the operator permits of two forklift drivers are provided for review.</p>

6.2 Postings

6.2.1	Are H&S notices kept on file, posted in the facility and in language(s) understood by majority of employees in accordance with applicable standards?	Yes
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6.3 Risk Assessment

6.3.1	Does the facility conduct H&S risk assessments in accordance with applicable standards?	<p>No</p> <p>New finding: The facility does not conduct the occupational hazardous factor test.</p> <p>Provisions on the Administration of Occupational Health at Work Sites (2021), Article 20</p>
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6.4 Risk Management

6.4.1	Does the facility maintain management plans to mitigate or respond to H&S risks in accordance with applicable standards?	Yes
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6.5 Governance

6.5.1	Does the facility have personnel responsible for management of H&S policies and procedures in accordance with applicable standards?	<p>Yes</p> <p>Previously, the safety manager was not provided with refreshing training annually.</p> <p>Currently, the facility has updated the safety manager certificate.</p>
6.5.2	Does the facility have an H&S committee that operates and documents activities in accordance with applicable standards?	Yes

6.6 Education

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6. Health & Safety

6.6.1	What health and safety trainings does the facility provide its employees and how often are they conducted?	Fire safety trainings, evacuation drills, machine operating use trainings, etc. are conducted for all employees twice per year.
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6.7 Emergency

6.7.1	Types of firefighting equipment used by facility:	<input type="checkbox"/> Fire extinguishers <input type="checkbox"/> Fire hoses
6.7.1.a	Number of firefighting equipment by type reported by facility in assessed areas:	<input type="checkbox"/> Fire extinguishers: 260 <input type="checkbox"/> Fire hoses: 30
6.7.2	Are fire extinguishers present and maintained in accordance with applicable standards?	Yes
6.7.3	Are emergency alarms present, maintained and detectable by employees in accordance with applicable standards?	Yes
6.7.4	Are secondary emergency exits present and located in accordance with applicable standards?	Yes
6.7.5	Are emergency exits maintained in accordance with applicable standards?	<p>No</p> <p>Previously, about 60% of safety exit doors in the facility could not be opened with a single release operation. All the sampled doors could be opened with a single release operation.</p> <p>Recurring finding: Previously, at least four safety exits were installed with roller shutter doors instead of side-hinged doors which opened to the travel direction.</p> <p>Currently, at least four safety exits were installed with roller shutter doors instead of side-hinged doors which opened to the travel direction. Code for Fire Protection Design of Buildings (GB50016-2014), Article 6.4.11</p> <p>Recurring finding: Previously, about seven viewed safety exits in the production area were missing exit signs.</p>

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6. Health & Safety

		<p>Currently, one sampled exit sign at building#2 cannot work.</p> <p>PRC Work Safety Law (2002), Amendment (2021), Article 42</p>
6.7.6	Are emergency exit pathways present and maintained in accordance with applicable standards?	Yes
6.7.7	Are evacuation plans present, posted and maintained in accordance with applicable standards?	<p>No</p> <p>Previously,</p> <ol style="list-style-type: none"> 1. All viewed evacuation plot plans were not designated with the location of assembly points. 2. The evacuation plot plans of the second, third, fourth floors of production building 2 and the second and fourth floors of production building 3 did not match with the facility's layout. 3. There was no evacuation plot plan provided on the first floor of the production building 3. <p>Currently,</p> <ol style="list-style-type: none"> 1. The location of assembly point is marked at evacuation plans. 2. The sampled evacuation plans could match the actual layout. 3. The evacuation plot plan is posted on the first floor of the production building 3. <p>New finding: Three sampled evacuation plans at building#3 are missing the location of viewer.</p> <p>Minimum Recommendation</p>
6.7.8	Are emergency assembly points present and maintained in accordance with applicable standards?	Yes
6.7.9	Is emergency lighting present and maintained in accordance with applicable standards?	<p>Yes</p> <p>Previously, about seven viewed safety exits in the production area were missing emergency lighting.</p> <p>Currently, all safety exits are installed with emergency lights.</p>
6.7.10	Are evacuation drills conducted and documented in accordance with applicable standards?	Yes
6.7.11	Is there a local law requiring evacuation drills?	Yes/twice per year
6.7.12	Frequency in which assessed facility conducts evacuation drills?	Twice per year
6.7.13	Shifts that participate in evacuation drills:	All workers

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6. Health & Safety

6.8 First Aid

6.8.1	Does the facility provide first aid equipment and is the observed equipment, designated, accessible and maintained in accordance with applicable standards?	Yes
6.8.2	Are employees trained and available to administer first aid procedures in accordance with applicable standards?	Yes
6.8.3	Does the facility have staff available to administer medical care in accordance with applicable standards?	N/A There is no legal requirement about this in China.
6.8.4	Does the facility provide a clinic and maintain medical records in accordance with applicable standards?	N/A There is no legal requirement about this in China and no clinic provided in the facility.
6.8.5	Do employees undergo medical tests related to the job function and are records of medical tests maintained in accordance with applicable standards?	No New finding: The facility provided all relevant employees who contact noise and chemical with in-service occupational health check, however, no pre-service or job-leaving occupational health check was provided to any related employees. PRC Law on Prevention and Control of Occupational Diseases (2002) Amendment (2018), Article 35
6.8.6	Does the facility manage medical waste in accordance with applicable standards?	N/A There is no medical waste generated in the facility.

6.9 Accident

6.9.1	Does the facility maintain records of employee accidents (e.g. injury, death) and facility accidents (e.g. equipment malfunction) in accordance with applicable standards?	Yes
6.9.2	Does the facility investigate, address and report employee and facility accidents in accordance with applicable standards?	Yes
6.9.3	Has the facility been free of fatalities and accidents that have resulted in loss of a body part in the past 12 months?	Yes

6.10 Personal Protective Equipment

6.10.1	Has the facility established a policy/ code governing personal protective equipment identification, use, maintenance and training?	Yes
6.10.2	Does the facility communicate and train employees (all levels) on the facility's personal protective equipment policy in accordance with applicable standards?	Yes
6.10.3	Are employees using the designated personal protective equipment in accordance with applicable standards?	Yes
6.10.4	Does the facility maintain the designated personal protective equipment in accordance with applicable standards?	Yes

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6. Health & Safety

6.11 Chemicals and Hazardous Materials

6.11.1	The facility does not use or maintain (store) chemicals or hazardous materials on site.	No
6.11.1.a	Has the facility established a policy/ code governing chemicals and hazardous materials identification, use, maintenance and training in accordance with applicable standards?	Yes
6.11.1.b	Does the facility communicate and train employees (all levels) on the facility's chemicals and hazardous materials policy in accordance with applicable standards?	Yes
6.11.1.c	Are employees handling the chemicals and hazardous materials at the facility in accordance with applicable standards?	Yes
6.11.1.d	Are materials labeled as hazardous, combustible or flammable and stored in accordance with applicable standards?	Yes
6.11.1.e	Does the facility prepare chemicals and hazardous materials for disposal in accordance with applicable standards?	Yes
6.11.1.f	Does the facility maintain an inventory of chemicals and hazardous materials in accordance with applicable standards?	Yes
6.11.1.g	Does the facility maintain safety data sheets of chemicals and hazardous materials in accordance with applicable standards?	Yes

6.12 Equipment Safety

6.12.1	Has the facility established a policy/ code governing equipment safety identification and maintenance in accordance with applicable standards?	Yes
6.12.2	Does the facility communicate and train employees (all levels) on the facility's equipment safety policy in accordance with applicable standards?	Yes
6.12.3	Does the facility maintain the designated equipment safety mechanisms in accordance with applicable standards?	Yes
6.12.4	Does the facility maintain inspection records for forklifts, boilers, generators, lifts (elevators), compressors, pressure vessels, cranes, and industrial refrigerators in accordance with applicable standards?	Yes
6.12.5	Is observed equipment at the facility operating and equipped with safety mechanisms in accordance with applicable standards?	Yes

6.13 Electrical

6.13.1	Are electrical panels, wiring and outlets maintained in accordance with applicable standards?	Yes
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6.14 Noise

6.14.1	Are noise levels monitored in accordance with applicable standards?	Yes
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6. Health & Safety		
6.15 Lighting		
6.15.1	Does the facility provide access to and maintain workplace illumination in accordance with applicable standards?	Yes
6.16 Ventilation and Temperatures		
6.16.1	Does the facility maintain windows or ventilation systems in the work environment in accordance with applicable standards?	Yes
6.17 Potable Water		
6.17.1	Do employees have unlimited and free access to potable water?	Yes
6.18 Sanitation		
6.18.1	Is general housekeeping maintained in accordance with applicable standards?	Yes
6.18.2	Do employees have unlimited and free access to toilet facilities?	Yes
6.18.3	In observed areas, does the facility have sanitary and maintained restroom/ shower facilities in accordance with applicable standards?	Yes
6.19 Food Preparation/ Canteen		
6.19.1	Is the food preparation area/ canteen operated and maintained in accordance with applicable standards?	N/A There is no kitchen or canteen provided in the facility currently.
6.20 Child Care		
6.20.1	Is child care facility located and maintained in accordance with applicable standards?	N/A There is no legal requirement about this in China and no child care facility is provided in the facility.
6.20.2	Is the facility work floor free of individuals under the age of 18 who are not employed by the facility?	N/A
6.21 Dormitory		
6.21.1	The facility does not provide accommodation for employees.	Yes
6.22 Other Practices		
6.22.1	Are any other H&S practices (not already covered in this section) in accordance with applicable standards?	Yes

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7. Environment		
7.1 Licenses/ Permits/Certifications		
7.1.1	Does the facility have a policy or system in place to identify and maintain applicable environmental permits/ licenses/ certifications?	<p>No</p> <p>Recurring finding: Previously, the facility did not complete the environmental completion acceptance currently.</p> <p>Currently, the facility did not complete the environmental completion acceptance currently.</p> <p>Regulations on the Administration of Construction Project Environmental Protection (1998), Amendment (2017), Article 19</p>
7.2 Postings		
7.2.1	Are environmental notices kept on file, posted in the facility and in language(s) understood by majority of employees?	Yes
7.3 Risk Assessment		
7.3.1	Does the facility conduct assessments on environmental risks in accordance with applicable standards?	Yes
7.4 Risk Management		
7.4.1	Does the facility maintain management plans related to those environmental risks to reduce or respond to environmental impacts to land, water, and air in accordance with applicable standards?	N/A
7.5 Education		
7.5.1	What environmental trainings does the facility provide its employees and how often are they conducted?	N/A
7.6 General Waste		
7.6.1	Main types of waste produced at the facility:	Living waste, leftover materials, etc.
7.6.2	Is the facility in possession of permits and licenses for onsite waste disposal that are current and in accordance with applicable standards?	Yes
7.6.3	Does the facility maintain an outdoor environment free of uncontrolled refuse?	Yes
7.6.4	Does the facility maintain a waste inventory and tracking system in accordance with applicable standards?	Yes
7.7 Hazardous Waste		
7.7.1	The facility does not appear to generate, report any generation, or attest to any generation of hazardous waste.	No
7.7.1.a	Has the facility established a policy/ code governing hazardous waste identification, inventory, control and training in accordance with applicable standards?	<p>No</p> <p>Recurring finding: Previously, the facility did not provide the hazardous waste disposal records for review</p>

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7. Environment		
		<p>during the assessment day. As per the EIA, the main hazardous waste was waste activated carbon and first washing water.</p> <p>Currently, the facility has signed the recycle contract with one qualified company to recycle the hazardous waste since October 22, 2021, but the hazardous waste is not recycled yet. As per the EIA, the main hazardous waste was waste activated carbon and first washing water.</p> <p>PRC Prevention and Control of Environmental Pollution by Solid Waste Law (1995) Amendment (2020), Article 81</p>
7.7.1.b	Does the facility communicate and train employees (all levels) on the facility's hazardous waste policy in accordance with applicable standards?	Yes
7.7.1.c	Does the facility separate hazardous waste from regular waste in accordance with applicable standards?	Yes
7.7.1.d	Does the facility prevent the direct discharge of hazardous waste into the environment?	Yes
7.7.1.e	Is hazardous waste delivered for offsite treatment and/or disposal to a licensed permitted contractor?	Yes
7.7.1.f	Does the facility maintain an inventory of hazardous waste in accordance with applicable standards?	Yes
7.8 Air Emissions		
7.8.1	The facility does not appear to generate, report any generation, or attest to any generation of air emissions.	No
7.8.1.a	Has the facility established a policy/ code governing air emissions inventory, control and training in accordance with applicable standards?	Yes
7.8.1.b	Does the facility communicate and train employees (all levels) on the facility's air emissions policy in accordance with applicable standards?	Yes
7.8.1.c	Is the facility in possession of permits and licenses for air emissions that are current and in accordance with applicable standards?	Yes
7.8.1.d	Does the facility maintain air pollution control devices in accordance with applicable standards?	Yes
7.8.1.e	Does the facility maintain an inventory of air emissions outputs and volumes in accordance with applicable standards?	<p>Yes</p> <p>Previously, the facility did not provide the monitoring report of the air emissions.</p> <p>Currently, the monitoring report of the air emissions is provided for review.</p>
7.9 Waste Water		
7.9.1	The facility does not appear to generate, report any generation, or attest to any generation of waste water.	N/A

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7. Environment

7.10 Noise Pollution

7.10.1	The facility does not appear to generate, report any generation, or attest to any generation of ambient noise.	N/A
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7.11 Other Practices

7.11.1	Are any other practices related to environmental impact (not already covered in this section) in accordance with applicable standards?	Yes
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8. Ethics and Business Integrity

8.1 UL Integrity

8.1.1	Was the UL Statement of Integrity accepted and signed?	Yes
8.1.1.a	By whom was the UL Statement Integrity signed?	Li Xudong/ General Manager

8.2 Bribery Attempt

8.2.1	Was the assessment free of any bribery attempt?	Yes
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8.3 Bribery and Facilitation Payments

8.3.1	Has the facility established a policy/ code governing bribery and facilitation payments in accordance with applicable standards?	Yes
8.3.2	Are employees who refuse to participate in bribery and facilitation payments not adversely affected (e.g. demotion, termination)?	Yes

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9. Pictures

Facility Profile



Facility name



Facility gate



Training certificate#1



Training certificate#2

Health & Safety



Corrected-Door open with single motion



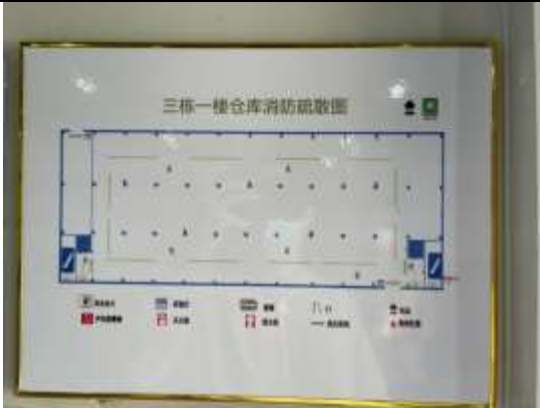
Corrected-Door with exit sign and emergency light

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9. Pictures



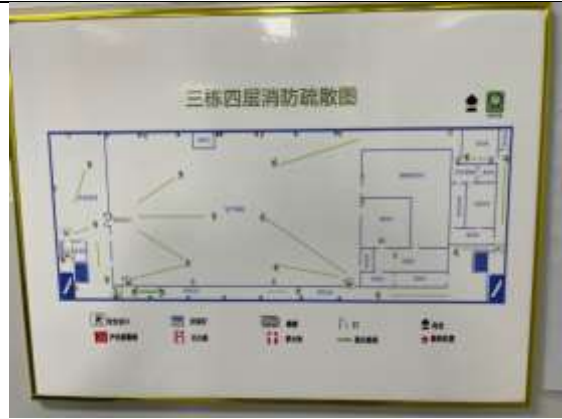
Corrected-Evacuation plot posted at the first floor of the production building 3 / assembly point is marked



NC-rolling door is used



NC-exit sign cannot work



NC-the location of reviewer is not marked



Work area



Finished goods warehouse

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9. Pictures



Client sample product#1



Client sample product#2