

## BV-AVON 2 MANDAY FACTORY AUDIT CHECKLIST WITH ROHS - 29JAN2014 (AVON INTERNATIONAL)

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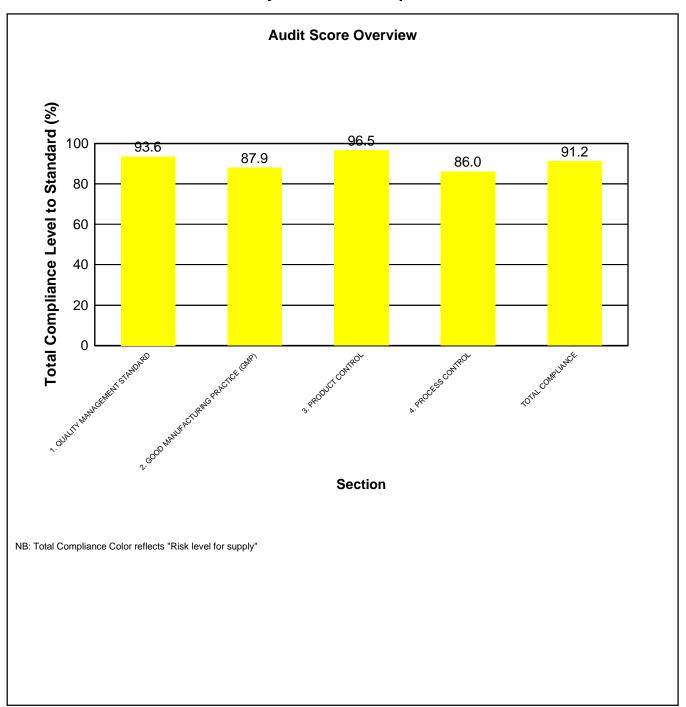
Performance Overview					
Audit Details					
BV Ref:	10202261397				
Auditor:	JEVONS HE				
Audit Date:	SEP 07, 2020 - SEP 07, 2020				
Date of Previous Audit:	Jul 05, 2019				
Previous Audit #:	10191631847				
Vendor Name:	THE HOUSE OF BUSBY				
Factory Name:	JIAXING JIAXIDA LEATHERWARE CO LTD				
Address:	NO.193 YUANFENG ROAD XIUZHOU DISTRICT JIAXING				
E-Mail Address:	Lydia@layogroup.com				
Tel:	8657382076819	Fax: 86-573-89977444			
Country:	CHINA				
Scope of Audit					
Against BV-Avon Factory Assessment Protocol – 2 MD					
Audit Category					
Women's Handbags					

Key Personnel					
Present at Audit (please tick 'X' below)					
Name	Job Title	Opening Meeting	On-site Audit	Documentation Review	Closing Meeting
Mr. Li Yuxiang	General Manager				
Mr. Wang Ji	Production Manager	X			X
Mr. Zhou Guoliang	Quality Manager	X	X	X	X

Audit Results						
Non Conformance(s)  Total Compliance Risk I					Follow-up	
Level to Standard	Critical(s)	Major(s)	Minor(s)	Supply	frequency	
91.15%	0	0	21	YELLOW	12 MONTHLY FOLLOW-UP	

# **Company Profile** Factory established: 2015 ~Main manufacturing processes: Cutting, gluing, sewing, finishing and packing ~Product category: Women's Handbags ~Factory area: 4,000 square meters ~Employee number: 39 empolyees ~Production capacity: 50,000 pcs per month ~International certification: Nil ~Peak season: Not obvious ~Major market: Africa (70%), South American (20%), Europe (10%) ~Major customer: Avon, Primark ~Product liability insurance and product recall insurance were purchased? Nil ~Integrity and bribery case: Nil Remark 1): Sand blasting is not a current capability at the factory and never was.

## **Analysis of Site Compliance**



#### **Degree of compliance Overview (per section)**

Section	Green	Yellow	Orange	Red	N/A	Total Questions
Quality Management Standard	41 (78.85%)	6 (11.54%)	0 (0.00%)	0 (0.00%)	5 (9.62%)	52
2. Good Manufacturing Practice (Gmp)	37 (77.08%)	8 (16.67%)	0 (0.00%)	0 (0.00%)	3 (6.25%)	48
3. Product Control	31 (86.11%)	2 (5.56%)	0 (0.00%)	0 (0.00%)	3 (8.33%)	36
4. Process Control	20 (58.82%)	5 (14.71%)	0 (0.00%)	0 (0.00%)	9 (26.47%)	34
OVERALL	129 (75.88%)	21 (12.35%)	0 (0.00%)	0 (0.00%)	20	170 (100%)

	Audit Findings Summary Critical Non-conformance Section				
Clause No.					
NIL					

Please submit a corrective action plan within 14 days after the audit for the nonconformance's mentioned in the above and underneath sections.

Audit Findings Summary				
Clause No.	Clause Requirement	Levels of Non- Conformance	Audit Findings	
1	QUALITY MANAGEMENT STANDARD			
1.2.1	The company policy shall be available and state the company's intentions to meet its obligations to manufacture quality, safe and legal products, and responsibility to its customer.	(YELLOW)	The quality policy was defined on quality manual and regularly reviewed by factory senior management, but it was not communicated with other employees, such as the production employees, and 2 out of 3 sampled production employees included the sewing workshop director did not know what the quality policy was.	
1.3.1	The company shall ensure that mechanisms (e.g., appraisal, KPI) are in place to monitor the effectiveness of employees' operation.		The factory established the mechanisms (e.g., appraisal, KPI) to monitor the effectiveness of employees' operation, but the performance monitoring records were not maintained for 1 out 3 sampled employees worked at sewing workshop.	
1.8.1	The company shall establish procedures for supplier approval AND on-going monitoring program for all raw materials, packaging, sub-contracting, and utilities suppliers.		The factory established the procedures (File No.: JXD/QP17-2016) for supplier approval AND on-going monitoring program, and maintained the approval supplier list, initial/annual approval records and monthly on-going monitoring records. However, per records review, it was noted 1 out of 3 sampled suppliers named "Huatai Non-woven Fabrics Factory" was not included in the approval supplier list, also did not have the related approval records and on-going monitoring records.	
1.9.2	Raw materials (including packaging), work in progress and finished products shall be identified to ensure traceability.		Per onsite observation, it was noted the finished products, semi-finished products and most of the incoming materials (such as fabrics and package) were properly identified with labels to ensure the traceability, except some zipper pullers (at least 3 bags) stored at trims warehouse were not identified with label to ensure the traceability.	
1.9.5	The system shall be regularly tested to ensure traceability can be determined from raw material source to finished product and vice-versa.	(YFLLOW)	The factory established the procedure (File No.: JXD/QP10-2016) for testing of traceability system, and had tested the traceability system from products to materials annually, but did not test the traceability system from materials to products.	
1.15.5	All documents in use are the correct version.	Minor (YELLOW)	Most of the quality documents, such as the quality procedure, inspection instructions and etc. in use were correct version, except the operation guidance posted at sewing workshop was not controlled by version. Furthermore, one controlled work instruction posted on die-cutting machine was stained and broken.	
2	GOOD MANUFACTURING PRACTICE (GMP)			
2.1.1	Building exterior and interior shall be maintained in good conditions to prevent product contamination.	14111101	The building exterior and most of the building interior was acceptable, except parts of ceiling was peeling off cements at fabric cutting workshop.	
2.3.1	Premises are sufficiently illuminated in order to permit effective cleaning, production, monitoring, and inspection.		Per on site check by lux meter, it was noted the lighting was insufficient at incoming materials inspection area (328 lux), in-line inspection area of gluing workshop (210 Lux) and final products inspection area (507 Lux).	

			For reference, the lighting should be no less than 1000 lux at inspection areas.
2.3.3	Where appropriate, humidity and ambient temperatures are controlled to ensure product integrity.		The factory established the documented procedure (File No.: JXD/QP26-2016) for humidity and ambient temperatures control, and installed the thermo-hygrometers at some working areas, such as sewing workshop for humidity and ambient temperatures control, but did not install the thermo-hygrometer at trims warehouse and finished goods warehouse for humidity and ambient temperatures control.
2.4.2	The company shall establish maintenance program to ensure all equipment and production machinery are adequately maintained.		The factory established the maintenance program included the daily/monthly/yearly maintenance plan for machines and tools, and maintained the related maintenance records. However, per on site observation, it was noted the surface of 1 out of 2 sampled gluing machines was very dirty; furthermore, 1 out of 3 sampled sewing machines had dirty oil tank and low oil level at sewing workshop.
2.6.3	No evidence of employee wearing jewellery, watches, other potentially contaminating apparel (check company's policy) observed.	Minor (YELLOW)	The factory established the policy for jewelry control, but it was not implemented strictly, such as one employee was wearing bracelet while working at sewing workshop.
2.7.1	The company shall either contract the services of a competent pest control organisation, or shall have trained personnel, for the regular inspection and treatment of premises to deter and eradicate infestation. Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.	(YELLOW)	The factory established the pest control procedure (File No.: JXD/QP25-2016) and conducted the pest control by internal trained personnel, also maintained related pest control records. However, per onsite observation, it was noted one set of fly kill lamp installed at cutting workshop was not working properly; furthermore, one set of mouse trap installed at cutting workshop was not supplied with bait.
2.7.3	Pest activity report with corrective actions shall be completed and satisfactorily verified.	Minor (YELLOW)	The factory only maintained the daily check records of pest facilities and activities, but no further analysis was conducted, also no corrective actions were initiated and followed.
2.11.2	All finished goods and materials shall be stored at least 45 cm from walls or elevated off the floor.		Per onsite observation, it was noted the finished goods were properly stored at least 45 cm from walls and elevated off the floor, but parts of the fabrics (around 5 rolls) were stored close to interior wall stud at fabrics storage area.
3	PRODUCT CONTROL		
3.4.3	Conformance to specification/formulation shall be measured at the sample size, frequency and method indicated by customer's requirements.	(YELLOW)	The factory established the testing instructions with specific sampling plan, schedule/frequency, sampling size and accept/reject criteria for in house testing, such as for pull strength test of handle, the sampling size was at least 3 pieces per lot during both production and final inspection stage, and the accept criteria was 10kgf minimum held for the full 5 minutes at 90 angle. However, per records review and employees interview, it was noted the factory only conducted pull strength test for finished products during final inspection, but not conducted it during production process (e.g. sewing and button attaching process)
3.5.1	Procedures shall be in place to prevent the contamination of raw materials, packaging and finished products.		The factory established the procedure to prevent the contamination of raw materials, packaging and finished products, and most of the materials and products were properly protected, except one palletized of cut panels with light color were bundled by dark strings at cut panels storage area.

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4	PROCESS CONTROL		
4.2.2	Incoming materials, including sub-contracted semi-finished parts / components, shall be inspected/tested against purchase order or specification requirements before use.	( VELLOW )	The factory conducted inspection and verification for incoming goods, such as the sampling plan was defined as 10% per lot and 4 points system was used for roll packed fabrics, and GB2828.1, General single sampling, Level-II of appearance check, AQL: Critical not allowed, Major 1.5, Minor 2.5, and 3–5 pieces per lot of dimension and specification check and no defect was allowed for countable trims, and related inspection records were kept. However, per records review, it was noted the penalty score per roll was incorrectly calculated on 1 out of 3 sampled fabrics inspection records (fabrics of PO#: C95464 inspected on May.4, 2020). Furthermore, the sampling size and original data of dimension and specification check were not issued on 1 out of 3 sampled trims inspection records (e.g. plastic buckle of PO#:C95475 inspected on Sep. 2, 2020).
4.3.4	A duplicate of an approved production sample with comments shall be provided and in use for all necessary operations as reference for operators.	(YELLOW)	The approved production sample with comments were provided at most of the necessary operations as reference for operators, such as sewing area, but not provided at gluing area.
4.3.5	The inspectors shall use a formal, documented inspection schedule and sampling plan with documented records, which cover all critical/major elements of the manufacturing process.	(YELLOW)	The sampling plan for patrol inspection was defined as 10 pieces once per 2 hours, and the AQL criteria was critical /major defect not allowed, and minor defects no more than 2 pieces. Per review the patrol inspection records of sewing process, it was noted the materials in use, workmanship and etc were checked and recorded, but the measurement audit data were not recorded for verification, which was insufficient.
4.4.1	Pre-final and final inspection shall be conducted as per customer requirements.	Minor (YELLOW)	The factory defined the sampling plan basing on GB2828.1, Single general inspection, Level-II of appearance check, AQL: Critical not allowed, Major 1.5, Minor 2.5, 3~5 pieces per style of dimension and specification check and no defect was allowed, and maintained the related inspection records. However, per records review (such as for PO#C95473 inspected by Aug.26, 2020), it was noted the item name, PO number, lot size, sampling size of appearance check, defect description and inspection result were issued, but the sampling size and original data of dimension and specification check were not issued, which was insufficient.
4.7.2	Measuring and monitoring equipment is routinely calibrated to recognised national standards.		The factory established the calibration procedures for measuring equipment, and maintained the calibration plan and valid calibration certificates for all measure equipment, such as light box, thickness tester etc. However, per onsite observation, it was noted the calibrated tape measure, caliper, thickness tester and light box used at incoming materials inspection area were not affixed with the calibration stickers or labels.

#### **Digital Photo Records**









