Costco GMP General Hardlines Factory Assessment

Version No.: 11 6-Jun-22

Audit Details

Costco Audit Request #	202207-NFGMP-13771		
Audit Type	**Initial Audit**		
Audit Report #	10222010520	Auditor Name	Yuki Hu/Jason Zhao
Audit Start Date	Aug 22,2022	Number of Mandays	2
Follow-up Audit 1	**Not Applicable**		
Factory Name	**Hangzhou Freetron Industrial Co Ltd**		
Address	No.1117 Chunjiang East Road, Economy Development Area of Tonglu		
City	Hangzhou	State/Province	Zhejiang
Country	China		
Postcode	311500		
Telephone #	0571-58593753		
E-mail	tlluo@freetron.net		
Supplier Name	Progressive International Corporation		

Key Personnel

Name	Job Title	E-mail ID
Dong Weiwei	General Manager	dw@freetron.net
Lu Linjun	Quality Manager	llj@freetron.net
Xie Weijun	Production Manager	xwj@freetron.net

Note: provide up to 5 key personnel only

Sub-contractor Information

Processes	Factory Name	Factory Address
Nil	N/A	N/A

Costco GMP General Hardlines Factory Assessment	
Company Profile	
Factory established in year:	2002
Main manufacturing processes:	Rubber refining, Vulcanization molding, Blow molding/ Injection molding, Assembly and Packing
Product category	Plastic and silicone commodities such as bags, boxes and lids, etc
Factory area / dimensions	7000 square meters
Number of Buildings	3
Total number of employees	179
Production capacity	50,000 pieces per month
International certification	ISO19001:2015, ISO14001:2015
Peak season	Not obvious
Major market	U.S. / North America (60%), E.U (20%), Asia (20%)
Major customer	OXO , TPC, PIC, BergHoff
Remarks (if any): 2 auditor names: Yuki Hu/Jason Zhao 2 man days 14 hours spent on site.	

AUDIT RESULT SUMMARY

Hangzhou Freetron Industrial Co Ltd

Initial Audit			
Report #	10222010520	Audit Date	Aug 22,2022
Auditor Name	Yuki Hu/Jason Zhao	Number of Mandays	2
	Section Name	**Section Score**	**Section Rating**
Section 1	Management Commitment & Continual Improvement	75%	Yellow
Section 2	Risk Management	87%	Orange
Section 3	Quality Management System	88%	Orange
Section 4	Site and Facility Management	85%	Orange
Section 5	Product Control	97%	Yellow
Section 6	Product Testing	88%	Yellow
Section 7	Process Control	98%	Yellow
Section 8	Personnel Training	75%	Orange
		Overall Score	**Overall Rating**
		89.65%	**Orange**

Factory Name	Audit Date	Report #
Hangzhou Freetron Industrial Co Ltd	Aug 22,2022	10222010520

Costco GMP General Hardlines Factory Assessment		**Initial Audit**	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
1	**Management Commitment & Continual Improvement**		
1.1	**Does factory establish a quality policy stating the factory's intentions to meet its obligations to manufacture quality, safe and legal products, and its responsibility to the customer?**	Full Compliance	
1.2	**Is the policy communicated throughout the factory, and regularly reviewed?**	Non Conformity	Factory had a documented quality policy, and annually reviewed when management review. However, it was not communicated (e.g. posting at public area or training to employees) within the organization. 5 employees interviewed on site did not know factory's quality policy.
1.3	**Did management develop and implement a management system to achieve their goals for product quality, safety and customer requirements?**	Full Compliance	
1.4	**Does factory review effectiveness of management systems (e.g. QMS) at defined intervals (minimum once per year)?**	Full Compliance	
1.5	**Are there documentary evidence that demonstrate management commitment to improve any significant area of findings identified during an audit?**	Full Compliance	
1.6	**Does factory track its key performance indicators (KPI) for on-time delivery, outgoing quality, complaint rate, etc.?**	Deviation	The factory had documented and tracked the key performance indicators (KPI) for on-time delivery, outgoing quality and etc, and maintained the monthly tracking records, however, the key performance indicators (KPI) for complaint rate was not documented and tracked.
2	**Risk Management System**		
2.1	**Legislative and Safety Requirements**		
2.1.1	**Is the factory aware of relevant legislation, mandatory standards and industry/customer codes of practice applicable to the product in the countries of intended sale, and having a process in place for ensuring it is kept informed of changes to the relevant information?**	Full Compliance	

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2.1.2	Does the factory have a means of validating information impacting product safety, quality and legality, where such information is provided by the customer or related party?	Full Compliance	
2.2	Risk Assessment		
2.2.1	Does the factory establish a Product Risk Assessment for each product or a group of similar products, e.g., FMEA?	Full Compliance	
2.2.2	Where manufacturing sites have no responsibility for product design, is the factory provided with a validated copy of the product risk assessment?	Not Applicable	The factory had responsibility for product design.
2.2.3	Does the product risk assessment address the following aspects which have an effect on product safety and legality?		
2.2.3.1	User types (e.g., new born, young children, vulnerable people i.e., elderly, disabilities)	Full Compliance	
2.2.3.2	Product use (e.g., behavior, durability, user awareness, information and advice)	Full Compliance	
2.2.4	Does the product risk assessment determine the following?		
2.2.4.1	Possible Hazard/Risk Identification (e.g. Chemical, Physical, Regulatory)	Full Compliance	
2.2.4.2	Risk level for each identified hazard/risk (e.g. Severe, High, Moderate, Slight)	Full Compliance	
2.2.4.3	Whether the risk is acceptable considering the probability or likelihood and the severity and potential consequences of the effects on consumer safety (e.g., Not Acceptable, Review & Improve, Acceptable)	Full Compliance	

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2.2.5	**Does the factory conduct a Process Risk Assessment of hazards potentially introduced during the production, packaging or storage processes?**	Deviation	The factory conducted a process risk assessment covered the production, packaging and storage processes, but the process risk assessment did not determine the control of wooden material's associated risks, mold growth on material / product risks, personal sanatory / hygiene risks. Moreover, personal protective equipment were not addressed on process risk assessment report.
2.2.6	**Does the process risk assessment take the following into account?**		
2.2.6.1	**Manufacturing parameters such as pressure, time, temperature**	Full Compliance	
2.2.6.2	**Conditions of equipment, molds, dies, machinery**	Full Compliance	
2.2.6.3	**Chemicals / materials used for equipment (e.g. lubricating oils and paints)**	Full Compliance	
2.2.6.4	**Calibration of equipment**	Full Compliance	
2.2.6.5	**Policies on foreign body contamination (e.g. needles, metal, glass and brittle plastics)**	Full Compliance	
2.2.6.6	**Policies on microbiological contamination (e.g. hygiene of toilet & canteen, pest control)**	Deviation	The factory determined policies on pest contamination during the process risk assessment, but did not determine the control of wooden material's associated risks, mold growth on material / product risks, and personal sanatory / hygiene risks.
2.2.6.7	**Personal protective equipment (including specific clothing and footwear)**	Non Conformity	Personal protective equipment were not addressed on process risk assessment report, and during on site observation, workers did not wear PPE, e.g. refining and packing workers did not wear gloves, and etc.
2.2.7	**Does the process risk assessment identify the following?**		
2.2.7.1	**A list of potential risk or hazards in the production process**	Full Compliance	
2.2.7.2	**Control points to manage the identified risk to acceptable level**	Full Compliance	
2.2.7.3	**Accept / reject limits defined for each control point**	Full Compliance	
2.2.7.4	**Corrective action to be taken where a CCP is out of control**	Full Compliance	

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2.2.7.5	Responsibility of Control Points	Full Compliance	
2.2.7.6	Records of monitoring & reviews	Full Compliance	
2.3	Verification of Risk Assessment		
2.3.1	Is the verification of risk assessment carried out prior to production?	Full Compliance	
2.3.2	Is the risk assessment carried out by competent personnel (internal or external)?	Non Conformity	The formal training program against risk assessment was not established and implemented to relevant employees, no relevant training records were available.
2.3.3	Is the risk assessment regularly reviewed, at least annually or when changes made to product design and materials and/or key manufacturing processes?	Full Compliance	
2.3.4	Does the factory implement risk management systems based on a systematic risk assessment system to assure product safety legality and quality?	Deviation	Risk management system was implemented based on a systematic risk assessment system, but Q2.2.5 rated as Partial.
3	MANAGEMENT SYSTEM		
3.1	Documented Quality System		
3.1.1	Does factory have a documented quality system approved by top management, outlining the criteria and methods used to meet system requirements?	Full Compliance	
3.1.2	Does the quality system include detailed procedures, instructions, and reference documents covering all manufacturing processes?	Full Compliance	
3.2	Organizational Structure, Responsibility and Authority		
3.2.1	Does factory define and communicate the levels of responsibility and accountability for staff involved with product safety, legality, and quality?	Full Compliance	

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3.2.2	**Are there appropriate arrangements in place, to cover for the absence of key staff?**	Non Conformity	No written back up arrangements were in place for the absence of key staffs such as production manager and quality manager. Reliever employees for key staff were not identified.
3.3	**Customer Focus**		
3.3.1	**Is there a process in place to communicate customer's needs and expectations to all relevant employees?**	Full Compliance	
3.3.2	**Are performance indicators relating to customer satisfaction established?**	Full Compliance	
3.3.3	**Does factory establish a procedure or policy to safeguard customer property including software and intellectual property?**	Full Compliance	
3.4	**Specifications**		
3.4.1	**Do specifications or codes of practice exist for raw materials (including packaging), intermediate/semi processed products (where appropriate), and finished products?**	Full Compliance	
3.4.2	**Are specifications adequate, accurate, and ensure compliance with relevant safety, legislative and customer requirements?**	Full Compliance	
3.4.3	**Any changes in product specifications are formally agreed with customers and then communicated to relevant departments?**	Full Compliance	
3.5	**Purchasing, Supplier and Sub-Contractor Approval and Performance Monitoring**		
3.5.1	**Are there procedures for approval and an on-going monitoring program for sub-contractors and suppliers of all raw materials, packaging, and utilities? Does factory use the results of the approval process to determine acceptable/non acceptable sources?**	Full Compliance	

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3.5.2	**Do these procedures include clear criteria for assessment as well as standards of performance required? (Assessment may take the form of monitoring performance through in-house checks, certificates of analysis or extend to supplier or sub-contractor inspection, as appropriate. Assessment may include evaluation of systems, product safety information and legislative requirements.)**	Deviation	The defined standards of supplier performance required was quality (70%), on-time delivery rate (10%) and service cooperation (20%), however, per records review, the actual used standards were quality (50%), on-time delivery rate (30%), and service cooperation (20%).
3.5.3	**Does factory provide material specifications and compliance requirements to raw-material, trims and packaging materials suppliers when placing orders?**	Full Compliance	
3.6	**Identification & Traceability**		
3.6.1	**Is there a lot identification and traceability system for all raw materials (including packaging), work in progress and finished products?**	Full Compliance	
3.6.2	**Are raw materials (including packaging), work in progress and finished products identified to ensure traceability?**	Deviation	Per onsite observation, raw materials, most of work-in-process and finished products were properly identified. However, it was found one batch of semi-finished products was not identified with relating PO number in semi-finished product warehouse
3.6.3	**Can factory identify, trace, and locate 100% of finished product lots/batches from raw material (based on random sampling)?**	Full Compliance	
3.6.4	**Can factory identify, trace, and locate 100% of raw materials used in customer products (based on random sampling)?**	Full Compliance	
3.6.5	**Is the system regularly tested to ensure traceability can be determined from raw material source to finished product and vice-versa?**	Full Compliance	

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3.7	Incident Management and Product Recall		
3.7.1	Does factory have an incident management procedure for incidents or emergencies that impact product quality, safety or legality?	Full Compliance	
3.7.2	Is there a procedure to ensure that customers are notified immediately of any issue which has potentially resulted in an illegal or unsafe product being delivered or already delivered to the customer?	Full Compliance	
3.7.3	Is there an effective, documented Product Recall procedure in place? Is the procedure appropriate, formalized and capable of being operated at any time and takes into account stock requisition, logistics, recovery, storage and disposal?	Full Compliance	
3.7.4	Does factory conduct mock recall test to check effectiveness of Product Recall procedure at least once a year?	Full Compliance	
3.8	Complaint Handling		
3.8.1	Does factory have a system for the management of complaints?	Full Compliance	
3.8.2	Do records indicate that complaints are thoroughly investigated and corrective actions taken to eliminate the root cause of non-conformities to prevent recurrence?	Deviation	The factory maintained relevant CAPA records for customer complaints, but the follow up result for issued CAPA were not maintained.
3.9	Corrective and Preventive Action		
3.9.1	Does factory have a system for investigating the cause of significant non-conformity against operation procedures, which are critical to product safety, legality and quality?	Full Compliance	
3.9.2	Are there records indicating that the factory takes timely actions to eliminate the root cause of non-conformities against operation procedures in order to prevent recurrences?	Full Compliance	
3.10	Document Control		

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3.10.1	**Does factory maintain proper documentation for control of formulas, specifications, BOM, procedures and work instructions?**	Full Compliance	
3.10.2	**Controlled documents are secured and access restricted?**	Full Compliance	
3.10.3	**Are all relevant safety, legal, quality and complaint documents (e.g. QC, production, complaint, product safety records, etc.) shall be legible and retained in good condition for the time specified by customers or the factory QMS whichever is longer?**	Deviation	The factory established document control procedure, the document storage areas were in good condition, and the documents such as quality instruction, work instruction, etc issue records were kept, but the documents retrieve records or documents disposal records were not available in the factory.
3.10.4	**All documents in use are the correct version?**	Non Conformity	Per onsite observation and document review, most of document like SOP in use were correct version. However, the work instruction for rubber refining process was without version control and recipe for powder mixing was without approval signature.
3.10.5	**Any amendments to records are authorized?**	Full Compliance	
3.11	**Internal Audit**		
3.11.1	**Are internal audits on management systems (e.g. QMS) conducted at defined intervals (minimum once a year)?**	Full Compliance	
3.11.2	**All corrective actions and follow-ups related to internal audits are satisfactorily completed?**	Full Compliance	
4	**Sites and Facilities Management**		
4.1	**Factory layout**		
4.1.1	**Is the building designed, constructed and maintained to minimize any potential for product contamination?**	Full Compliance	

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4.1.2	Does the placement of machinery and equipment allow an efficient product flow and minimize the risk of product contamination, loss of traceability and damage?	Full Compliance	
4.2	Production flow		
4.2.1	Is a process flow diagram available?	Deviation	Process flow diagrams were established, however, no CCP (Critical Control Point) was identified on the process flow diagrams.
4.2.2	Do the premises allow sufficient working space and storage capacity to enable all operations to be carried out under safe and if necessary hygienic conditions, including areas such as raw material storage, component storage, production floor, packing or finishing area, finished product storage, etc.?	Full Compliance	
4.3	Segregation of products		
4.3.1	Is there effective segregation to minimize the risk of product cross-contamination taking into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality, and utilities?	Full Compliance	
4.4	Staff facilities		
4.4.1	Are staff facilities such as washrooms, canteens, and break areas designed and operated so as to minimize the risk of product contamination?	Full Compliance	
4.4.2	Are workers not allowed to have food, drink, or smoke at their work areas?	Full Compliance	
4.4.3	Where smoking is allowed under national law, are designated controlled smoking areas isolated from production areas to an extent that ensures smoke cannot reach the product?	Full Compliance	
4.4.4	Where specific work wear is required, are designated changing facilities provided for all personnel such as staff, visitors, or contractors?	Full Compliance	
4.4.5	Are suitable and sufficient hand-cleaning facilities provided at entrance and other appropriate points within production areas?	Full Compliance	

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4.4.6	**Any personal jewelry or other objects prohibited in the production areas for the risk of product contamination?**	Non Conformity	Written procedure for jewelry control was established, but per onsite observation, two workers were wearing earring, bracelet and rings at production area.
4.5	**Cleaning and hygiene practices(Where applicable) Note: Auditors should make a judgment if this sub-section is applicable based on nature of the products**		
4.5.1	**Are cleaning practices completed so as to minimize risk of contamination?**	Full Compliance	
4.5.2	**Are cleaning, pest control, and process-aid chemicals suitably identified and controlled to prevent the risk of product contamination?**	Full Compliance	
4.5.3	**Where cleaning services are outsourced, do service providers have a signed contract which identifies the scope and frequency of the work and a logbook maintained as a record of work done?**	Not Applicable	N/A for the cleaning services was performed by internal staff.
4.5.4	**Do documented cleaning procedures exist for the buildings, utilities, plant, and all equipment?**	Full Compliance	
4.5.5	**Do the documented cleaning procedures contain the following information: responsibility for cleaning, items or area to be cleaned, frequency of cleaning, method of cleaning, materials to be used, cleaning records and responsibility for verification?**	Full Compliance	
4.5.6	**Is cleaning and housekeeping carried out by trained personnel in accordance with documented procedures and records maintained?**	Full Compliance	
4.6	**Pest control**		
4.6.1	**Has the factory identified and controlled the risk of pest infestation on the site(by factory internal or external third party), through operation of pest control procedures?**	Full Compliance	
4.6.2	**Does the factory have a clearly defined contract with external contractors which reflect the activities of the site, or have trained staff who undertake this responsibility?**	Full Compliance	
4.6.3	**Are inspection record for pest control maintained and complete?**	Full Compliance	
4.6.4	**Are bait stations robustly constructed, operational, and effective in eliminating the target pests?**	Full Compliance	

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Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
4.6.5	**Are bait stations positioned to avoid potential contamination of materials and products? Are fly-killing devices and/or pheromone traps correctly sited and operational?**	Deviation	Per onsite observation, the bait station, fly-killing lamp and mouse cage were correctly positioned, but it was found that one mouse cage set at outdoor of finished products warehouse was not put bait inside.
4.7	**Lighting and ventilation**		
4.7.1	**Is there sufficient lighting in the factory, including the production floor, inspection areas, test areas, storage areas, maintenance areas, finishing and packing areas, etc.?**	Deviation	Onsite test with lux meter, the lighting was insufficient at below area: vulcanization molding area (203 lux), inspection area in assembly and packing workshop (422 lux), and packing area (452 lux). (Audit requirement: Inspection Areas: ≥ 750 Lux; Production Areas: ≥ 550 Lux; Packing area ≥ 300Lux)
4.7.2	**Is the ventilation adequate to maintain product safety, legality, and quality at the production floor, inspection areas, test areas, storage areas, maintenance areas, finishing and packing areas, etc.?**	Full Compliance	
4.8	**Contamination**		
4.8.1	**Does the factory have control of the transport and storage of products, from delivery of raw materials and components, to finished product?**	Deviation	Per onsite observation, the facilities that factory used for storage, transportation of materials, component and products were suitable and maintained in good condition. However, it was found the mixed plastic particle bags were stored on the floor at plastic particle mixing area, and the empty packaging cartons to be used for packing were stored on floor directly at packing area.
4.8.2	**Has the factory undertaken the necessary steps to identify and prevent the risks of foreign body contamination as identified by risk assessment including any contamination potentially introduced by the packaging?**	Full Compliance	
4.8.3	**Are tools and other sharp objects used in production controlled?**	Non Conformity	Sharp tools control procedure was established and required all sharp tools (e.g. scissors, blades) should be fastened to workbench, however, per onsite observation, it was respectively found one blade was not fastened to workbench at injection molding workshop and inspection area at assembly and packing workshop.
4.8.4	**Where a metal or foreign body detector is required or specified by a customer, do documented procedures exist specifying its use, location, critical limits for detection, maintenance, and recording of results?**	Not Applicable	No needle was used in the factory, and foreign body detector was not required for the products in the factory.

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Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
4.8.5	**Where applicable are all needles under control without any spare needles unsecured?**	Not Applicable	No needle was used in the factory.
4.8.5.1	**If a needle is broken, is there a process for the replacement?**	Not Applicable	No needle was used in the factory.
4.8.5.2	**Is there is process to handle and account for all parts of a broken needle?**	Not Applicable	No needle was used in the factory.
4.8.5.3	**Does the factory retain all needle control records for a minimum of one year?**	Not Applicable	No needle was used in the factory.
4.8.5.4	**Is appropriate action taken when a needle is missing or fragments cannot be found?**	Not Applicable	No needle was used in the factory.
4.8.6	**Is the use of wood within raw material handling, preparation, processing, packing, and storage areas eliminated except when used in the product or where associated risks have been evaluated and controlled?**	Non Conformity	Risk of wood materials was not considered in process risk assessment report, and it was found two broken wooden pallets were used at incoming materials warehouse and packing area.
5	**Product Control**		
5.1	**Reference Samples (Preproduction and Production Sample)**		
5.1.1	**Does the factory have a documented procedure to identify, select, categorize, handle, store, approve and use the reference samples (pre-production and production samples)?**	Full Compliance	
5.1.2	**Does the factory retain the samples which have been approved by the customer? If the customer approval is not possible, the sample representative of the agreed specification must be retained. (Note: Exception for those samples are physically very large or represent a very high cost, e.g., same style being produced in more than one line and/or one facility)**	Full Compliance	
5.1.3	**Are the samples retained with defined retention period, and securely stored in suitable environmental conditions to maintain their original status?**	Full Compliance	

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5.2	Chemical Control		
5.2.1	A 'List of Approved Chemicals with Corresponding Brands / Manufacturers' should be maintained for the chemicals used as an ingredient or in contact with the products. The list can be in electronic format or in the computer system, e.g., ERP.	Full Compliance	
5.2.2	When chemicals are used as raw materials or ingredients, does the factory have documented procedure for managing, approving and controlling the engineering changes / product changes that may alter the chemical composition of the final product?	Full Compliance	
5.2.3	Is the use of any substances classified as dangerous or of very high concern, in the country of sale documented?	Full Compliance	
5.2.4	When chemicals are used as raw materials or ingredients, are test reports or certificates of compliance available to demonstrate any presence of hazardous substances / Substances of Very High Concern (SVHC) in all incoming materials and components are below the threshold value for the country of sale?	Full Compliance	
5.2.5	Does the factory have test reports on components or finished products that confirm finished products that regulated hazardous substances are below the threshold value relating to the product safety regulations of the country in which the products are sold?	Full Compliance	
5.2.6	Are controlled storage facilities provided for all chemicals used in the factory site (including cleaning and pest control chemicals) as per the recommendations on the manufacturer label to avoid deterioration or degrade?	Full Compliance	
5.2.7	Are procedures, MSDS, description or diagram for the handling of chemicals available at the point of use?	Full Compliance	

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5.2.8	Are segregation or other measures in place to avoid cross contamination or undesirable chemical reaction of chemical substances and/or preparations (e.g., acids and bases, flammables and oxidizers should not be stored together)?	Full Compliance	
5.2.9	Does the factory adopt 'First-in and First-out'' logistic concept on its warehouse management for the chemicals with expiry date (i.e., materials with earlier expiry date should be used first)?	Full Compliance	
5.2.10	Are the production equipment and devices inspected and cleaned regularly between batches to avoid cross contamination?	Full Compliance	
5.3	Product Packaging Materials		
5.3.1	Are packaging assessed for fitness for purpose and determined suitable with regard to the following?		
5.3.1.1	Protecting the product from damage;	Full Compliance	
5.3.1.2	Maintaining the integrity of the product;	Full Compliance	
5.3.1.3	Protecting the consumer from injury; and	Full Compliance	
5.3.1.4	Preventing contamination	Full Compliance	
5.3.2	Does the product packaging conform to an agreed and documented specification and legal requirements of the country of sale with regard to composition, recyclability?	Full Compliance	
5.3.3	Are packaging materials effectively protected before being returned to storage?	Full Compliance	
5.3.4	Where staples or other metal closures are used for packaging, are appropriate precautions taken to prevent the risk of contamination, damage or injury to the product or consumer?	Not Applicable	No staple or other metal closures were used.
5.4	Control of Non conforming Materials		
5.4.1	Does the factory establish documented procedures for the control of non-conforming materials and products, including rejection, segregation, acceptance by concession or re-grading for an alternative use?	Full Compliance	
5.4.2	Are the procedures understood by the authorized personnel and implemented effectively?	Full Compliance	

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5.4.3	**Are all non-conforming products and their packaging handled or disposed of according to the nature of the problem and/or the specific customer or legislative requirements?**	Full Compliance	
5.4.4	**Are the records kept for the nonconformities and subsequent actions taken?**	Full Compliance	
5.5	**Product Transport, Storage and Distribution**		
5.5.1	**Is transportation in good repair and in a clean/hygienic condition?**	Full Compliance	
5.5.2	**Are vehicles loaded and unloaded in covered areas/bays to prevent the risk of contamination and damage?**	Non Conformity	The loading and unloading area was not covered in the factory.
5.5.3	**Where the product needs specific environmental requirements to prevent degradation, are these conditions documented, maintained and monitored during the transportation, storage and distribution?**	Full Compliance	
5.6	**Stock Control and Product Release**		
5.6.1	**Does the factory establish a procedure ensuring only products conforming to specifications/defined quality are dispatched?**	Full Compliance	
5.6.2	**Are the procedures for products dispatch include the following?**		
5.6.2.1	**a) release by authorized personnel**	Full Compliance	
5.6.2.2	**b) all inspections and testing shall be successfully completed and documented to verify legislative and other defined requirements are met.**	Full Compliance	
5.6.3	**Where home-workers or subcontractors are used, are the same procedures for products dispatch (as Q5.6.1 & Q5.6.2) applied to the works/products done by home-workers or subcontractors?**	Not Applicable	No home-workers or subcontractors were used in facility.
5.6.4	**Are controls for correct stock rotation in place to ensure materials and products used in the correct order and within the allocated shelf or usage life, where applicable?**	Full Compliance	
6	**Product Testing and Product Claims**		

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6.1	**Product Testing**		
6.1.1	**Does factory establish procedures to undertake or subcontract analyses / testing according to product type and intended retail market?**	Full Compliance	
6.1.2	**Does a documented testing plan exist which includes sample size, frequency, test method and pass/fail criteria for all tests on raw materials, work-in-process and finished products, to ensure that the final product meets customer requirements?**	Deviation	Testing plan including frequency, test method and pass/fail criteria for all tests was established, but the sampling size was not clearly defined.
6.1.3	**For those tests on finished products, which factory performs in-house (and does not utilize services of external accredited lab), does the in-house testing comply with the requirements of an approved Independent Laboratory Accreditation Standard or equivalent?** **Note: This clause is applicable only for those tests on finished products, which factory performs in-house and does not utilize services of external accredited lab.**	Not Applicable	The factory used outside third party for finished products testing.
6.2	**Product Claims**		
6.2.1	**Does factory undertake product testing or inspections to validate and verify any stated claims about a product specification, quality or performance?**	Full Compliance	
7	**Process Control**		
7.1	**Control of operations**		
7.1.1	**Are preproduction meetings undertaken prior to new or substantially changed products being produced, to evaluate and approve the processes?**	Full Compliance	
7.1.2	**In the event of deviation of the process from specification, is corrective action taken and recorded?**	Full Compliance	
7.2	**Control of incoming components and raw materials**		

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.2.1	**Are there documented approval procedures for raw materials and incoming goods, which assure conformance to agreed specifications, requirements and documented positive batch release including compliance to safety and regulatory requirements for the country in which the products will be sold?**	Full Compliance	
7.2.2	**Is there evidence of the inspection status of incoming components and raw materials?**	Full Compliance	
7.2.3	**Do the incoming goods procedures cover subcontracted work and work performed outside of the primary site?**	Not Applicable	No home-workers or subcontractors were used in facility.
7.3	**Calibration and control of measuring and monitoring devices**		
7.3.1	**Has all equipment used in accept or reject activity been effectively calibrated?**	Deviation	Randomly sampled three equipment used on site, it was found one electronic balance (number: 207) used at rubber refining area for color powder weighing was not calibrated after it was expired on Apr 21, 2022.
7.3.2	**Are records of the results of calibration and verification maintained for a suitable period taking account of the life of the products being produced?**	Full Compliance	
7.3.3	**Are procedures in place for actions to be taken if equipment is found not to be operating within specified tolerances and/or limits?**	Full Compliance	
7.4	**Equipment and tooling maintenance**		
7.4.1	**Is equipment properly specified before use and operating parameters for production equipment and tooling determined, validated, and implemented as part of the control plan?**	Full Compliance	
7.4.2	**Is there a documented system for planned maintenance covering all items of equipment and plant which are critical to product safety, legality, and quality?**	Full Compliance	
7.4.3	**Are preventative maintenance schedules or cycles documented and on schedule?**	Full Compliance	
7.4.4	**Are engineering and maintenance workshops controlled to prevent contamination risks to the product, and organized, clean and tidy to allow safe, efficient, and good-quality work?**	Full Compliance	
7.4.5	**Do machines, equipment, fixtures, tools and measurement equipment appear to be clean in good condition and well maintained?**	Deviation	Per onsite observation, most of production machine appeared to be clean in good condition, but one set of rubber vulcanization machine was leaking oil.
7.5	**Final product packing and control**		
7.5.1	**Do procedures exist to specify and control the packing of finished product, taking into account customers requirements?**	Full Compliance	

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.5.2	**Has the factory verified that the information shown on primary (consumer) package labels including bar codes and outer cartons are correct and meet the customer specification, regulatory and safety requirements of the region of intended sale?**	Full Compliance	
7.6	**Random Inspections**		
7.6.1	**Are in-line inspections carried out during assembly of the product**	Full Compliance	
7.6.2	**Procedures shall be in place to randomly sample and inspect work-in-process according to customer or internal IPQC requirements.**	Full Compliance	
7.6.3	**Products shall be inspected for appearance, size, color and workmanship prior to packing as per customer or internal requirements.**	Full Compliance	
7.6.4	**Product standards and guidelines shall be available and used by inspectors.**	Full Compliance	
7.7	**Industry Module**		
7.7.1	**Incoming Material**		
7.7.1.1	**Materials shall have independent test certificates to assure conformity with destination market and/or customer requirements regarding phthalates.**	Full Compliance	
7.7.1.2	**Inspection plan covering defect classification, sample size, and accept/reject criteria for incoming raw materials, components, accessories and packaging materials shall be defined and implemented**	Full Compliance	
7.7.1.3	**Fabrics shall be inspected according to 4-point, 10-point, or specified system before cutting.**	Not Applicable	No fabric was used in the factory.

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.7.1.4	**For battery operated or electrical items, the factory shall conduct RoHS check on corresponding incoming material and component.**	Not Applicable	No battery operated or electrical product in the factory.
7.7.1.5	**The storage area shall protect the raw material from effects of weather, contamination and/or infestation.**	Full Compliance	
7.7.2	**Chemical Treatment (N/A if no on-site chemical treatment)**		
7.7.2.1	**Controls shall be in place to check and monitor the chemical used for chemical treatment process.**	Not Applicable	No chemical treatment process in the factory.
7.7.3	**Markers, Patterns, Spreading and Cutting (N/A if no such processes)**		
7.7.3.1	**Paper pattern and markers shall be checked and approved prior to cutting.**	Not Applicable	No markers, patterns, spreading and cutting process in the factory.
7.7.3.2	**Procedures and controls for spreading process shall be in place based upon fabric properties. Relaxation time and spread height shall be appropriate for the material being spread.**	Not Applicable	No markers, patterns, spreading and cutting process in the factory.
7.7.3.3	**Procedures or work instructions shall define cut height and other parameters such as pressure based on material type and thickness**	Not Applicable	No markers, patterns, spreading and cutting process in the factory.
7.7.4	**Sewing/Looping (N/A if no such processes)**		
7.7.4.1	**Controls shall be in place to check and monitor panel quality (skipped stitch, broken needles, defects, thread torn, etc.).**	Not Applicable	No sewing process in the factory.
7.7.5	**Eyeing/Buttoning Process (N/A if no such processes)**		
7.7.5.1	**Jigs, fixtures, or patterns shall be used to control part shape/direction and/or hole location**	Not Applicable	No eyeing/buttoning process in the factory.
7.7.6	**Embroidery (N/A if no such process)**		

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.7.6.1	**Set-up instruction sheets shall be present at each embroidery machine. Thread tension shall be monitored with records kept.**	Not Applicable	No embroidery process in the factory.
7.7.7	**Cutting, Shaping, Drilling, Planning Processes (N/A if no such processes)**		
7.7.7.1	**Detailed work instructions or drawings shall be provided for operator reference at cutting, shaping, drilling and planning operations.**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.7.2	**Jigs, fixtures, or patterns shall be used to control part shape and/or hole location**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.7.3	**Part and/or hole dimensions shall be checked against an approved sample, specifications, or drawings.**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.7.4	**Issuance of abrasive material shall be monitored so as to ensure the correct abrasive usage as per the customers specification.**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.7.5	**Detailed work instructions or drawings shall be provided for operator reference in the sanding and polishing area.**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.7.6	**All sanding / polishing residue shall be removed prior to release to the next stage of production.**	Not Applicable	No cutting, shaping, drilling, planning process in the factory.
7.7.8	**Molding and Die Casting (N/A if no such processes)**		
7.7.8.1	**For melamine products, controls shall be in place to check weight of raw materials prior to preheating and molding process.**	Not Applicable	No melamine product was available in the factory.
7.7.8.2	**Molding / Die Casting parameters shall be defined in the control plan, work instruction, or set-up sheet.**	Full Compliance	
7.7.8.3	**Molding / Die Casting parameters (cycle time, temperature, pressure) shall be monitored.**	Full Compliance	

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.7.8.4	**Use of reground / recycle materials for production shall be in accordance with material manufacturers recommendation or customer specification and shall not compromise compliance with heavy metal or phthalate regulations.**	Full Compliance	
7.7.8.5	**First pieces after machine set-up shall be compared to standards and/or approved samples prior to actual production.**	Full Compliance	
7.7.8.6	**Controls of conditioning (drying/annealing/quenching) process which include pressure, temperature, cycle time should be controlled and recorded.**	Full Compliance	
7.7.9	**Coating, Printing and Finishing (N/A if no such processes)**		
7.7.9.1	**All paint containers shall be sealed when not in use.**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.9.2	**All paint shall be agitated and mixed as per the manufacturers or work instructions.**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.9.3	**The viscosity and color of paint shall be verified prior to use.**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.9.4	**Control of drying process which includes temperature, relative humidity, timing, coating methods should be monitored and recorded.**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.9.5	**Procedures and controls shall be in place to check and monitor coated/painted part quality (position, finishing, color mismatch, surface roughness etc.).**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.9.6	**First pieces after machine set-up shall be compared to standards and/or approved samples prior to actual production.**	Not Applicable	No coating, printing and finishing process in the factory.
7.7.10	**Stamping, Pressing, Lathing and Engraving (N/A if no such processes)**		

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.7.10.1	**Stamping / pressing / lathing / engraving process procedure, parameters and specs (pressure, speed, laser intensity etc.) shall be defined in the control plan, work instruction, or set-up sheet.**	Not Applicable	No stamping, pressing, lathing and engraving process in the factory.
7.7.10.2	**Stamping / pressing / lathing / engraving process parameters and specs (pressure, speed, laser intensity etc.) shall be monitored.**	Not Applicable	No stamping, pressing, lathing and engraving process in the factory.
7.7.10.3	**Procedures and controls shall be in place to check and monitor stamped, pressed, lathed, engraved part quality (position, finishing, deformation, dimension etc.).**	Not Applicable	No stamping, pressing, lathing and engraving process in the factory.
7.7.10.4	**First pieces after machine set-up shall be compared to standards and/or approved samples prior to actual production.**	Not Applicable	No stamping, pressing, lathing and engraving process in the factory.
7.7.11	**Mechanical Assembly**		
7.7.11.1	**Detailed work instructions, drawings and/or reference samples for every product shall be provided for operator reference at assembly operations.**	Full Compliance	
7.7.11.2	**Procedures and controls shall be in place to check and monitor assembled component/product quality (alignment, position, quantity etc.).**	Full Compliance	
7.7.11.3	**First pieces after line set-up shall be compared to standards and/or approved samples prior to actual production.**	Full Compliance	
7.7.11.4	**Electronic Static Device (e.g.. ESD wrist strap) shall be used in electrical component assembly lines.**	Not Applicable	No electrical component was used in the factory.
7.7.12	**Gluing, Welding Cold Staking, Screwing, Pressing (N/A if no such processes)**		
7.7.12.1	**Procedures and controls shall be in place for gluing/welding/staking application on every product which include application method, time, pressure, temperature, frequency etc.**	Not Applicable	No gluing, welding, cold staking, screwing, pressing process in the factory.

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
7.7.12.2	**Jigs, fixtures, or patterns shall be used to control part position and/or hole location**	Not Applicable	No gluing, welding, cold staking, screwing, pressing process in the factory.
7.7.12.3	**Control of drying process which includes temperature, relative humidity, timing and pressure should be monitored and recorded.**	Not Applicable	No gluing, welding, cold staking, screwing, pressing process in the factory.
7.7.12.4	**First pieces after machine/line set-up shall be tested against client requirement to verify effectiveness of the joining process.**	Not Applicable	No gluing, welding, cold staking, screwing, pressing process in the factory.
7.7.13	**Instructions, Components and Labeling**		
7.7.13.1	**All instructions shall be verified against the product specification to ensure that the correct language for the country of distribution has been included.**	Full Compliance	
7.7.13.2	**Component parts shall be added in sufficient quantity as specified in the product specification.**	Full Compliance	
7.7.13.3	**Labeling, warning and packaging shall be inspected according to product specification.**	Full Compliance	
8	**Personnel Training and Competency**		
8.1	**Does the factory establish training procedures?**	Full Compliance	
8.2	**Does the factory determine necessary competence for personnel performing work impacting product safety, legality and quality?**	Full Compliance	
8.3	**Does the factory regularly identify training needs (including refresher training) for personnel performing work that affects product safety, legality and quality?**	Non Conformity	No documented assessment of training needs was implemented in the factory.

Costco GMP General Hardlines Factory Assessment		Initial Audit	
Clause #	**Sectional Scope & Clause Requirements**	**Assessment Result**	**Audit Findings**
8.4	**Are personnel performing work that affects product safety, legality and quality (including temporary personnel and contractors) appropriately trained and instructed prior to commencing work and adequately supervised throughout the working period?**	Full Compliance	
8.5	**Are the personnel, who have a direct effect on the safety, quality or legality of products, trained to ensure understanding of risk assessment procedures or outcomes as necessary for their activity?**	Non Conformity	The factory had not provided the training for the employees who had a direct effect on the safety, quality or legality of products to ensure they were understanding of risk assessment procedures or outcomes as necessary for their activity, and no such training plan and records were kept.
8.6	**Are the effectiveness of trainings evaluated?**	Full Compliance	
8.7	**Are up-to-date training records stored in a secure way such that privacy of personnel is protected?**	Full Compliance	
8.8	**Are the personnel performing work that affects product safety, legality and quality demonstrably competent to carry out their activity?**	Full Compliance	

Corrective Action Plan (CAP) Report

Costco GMP General Hardlines Factory Assessment

Factory Name:	Hangzhou Freetron Industrial Co Ltd			Factory Representative Name and Signature:	Auditor Signature:
Address:	No.1117 Chunjiang East Road, Economy Development Area of Tonglu				
Report number:	10222010520	Auditor Name:	Yuki Hu/Jason Zhao	Factory Comments (if any):	
Audit Type:	Initial Audit	CAP Desktop Review done by:			
Audit Date:	Aug 22,2022	Evidence Reviewed by:			

To be Completed by 3rd party - within 5 working days from Audit Date				To be Completed by Factory - within 10 working days from Audit Date			To be Completed by 3rd Party - within 2 working days from the receipt of CAPA from Factory		CAP Evidence Collection - To be Completed within 30 calendar days from last audit date		
1	2	3	4	5	6	7	8	9	10	11	12
Clause No.	Original Clause Requirement	Levels of Non-Conformance	Audit Findings	Corrective Action Plan	Responsible Persons	Due Date	Agreement with factory or Comments for Revision	Objective Evidences Required	Objective Evidences	CAPA Validation Results	Remarks
1.2	Is the policy communicated throughout the factory, and regularly reviewed?	MINOR	Factory had a documented quality policy, and annually reviewed when management review. However, it was not communicated (e.g. posting at public area or training to employees) within the organization. 5 employees interviewed on site did not know factory's quality policy.								
1.6	Does factory track its key performance indicators (KPI) for on-time delivery, outgoing quality, complaint rate, etc.?	MINOR	The factory had documented and tracked the key performance indicators (KPI) for on-time delivery, outgoing quality and etc, and maintained the monthly tracking records, however, the key performance indicators (KPI) for complaint rate was not documented and tracked.								
2.2.5	Does the factory conduct a Process Risk Assessment of hazards potentially introduced during the production, packaging or storage processes?	MINOR	The factory conducted a process risk assessment covered the production, packaging and storage processes, but the process risk assessment did not determine the control of wooden material's associated risks, mold growth on material / product risks, personal sanatory / hygiene risks. Moreover, personal protective equipment were not addressed on process risk assessment report.								
2.2.6.6	Policies on microbiological contamination (e.g. hygiene of toilet & canteen, pest control)	MINOR	The factory determined policies on pest contamination during the process risk assessment, but did not determine the control of wooden material's associated risks, mold growth on material / product risks, and personal sanatory / hygiene risks.								
2.2.6.7	Personal protective equipment (including specific clothing and footwear)	MODERATE	Personal protective equipment were not addressed on process risk assessment report, and during on site observation, workers did not wear PPE, e.g. refining and packing workers did not wear gloves, and etc.								
2.3.2	Is the risk assessment carried out by competent personnel (internal or external)?	MODERATE	The formal training program against risk assessment was not established and implemented to relevant employees, no relevant training records were available.								
2.3.4	Does the factory implement risk management systems based on a systematic risk assessment system to assure product safety legality and quality?	MODERATE	Risk management system was implemented based on a systematic risk assessment system, but Q2.2.5 rated as Partial.								
3.2.2	Are there appropriate arrangements in place, to cover for the absence of key staff?	MINOR	No written back up arrangements were in place for the absence of key staffs such as production manager and quality manager. Reliever employees for key staff were not identified.								
3.5.2	Do these procedures include clear criteria for assessment as well as standards of performance required? (Assessment may take the form of monitoring performance through in-house checks, certificates of analysis or extend to supplier or sub-contractor inspection, as appropriate. Assessment may include evaluation of systems, product safety information and legislative requirements.)	MINOR	The defined standards of supplier performance required was quality (70%), on-time delivery rate (10%) and service cooperation (20%), however, per records review, the actual used standards were quality (50%), on-time delivery rate (30%), and service cooperation (20%).								
3.6.2	Are raw materials (including packaging), work in progress and finished products identified to ensure traceability?	MINOR	Per onsite observation, raw materials, most of work-in-process and finished products were properly identified. However, it was found one batch of semi-finished products was not identified with relating PO number in semi-finished product warehouse								
3.8.2	Do records indicate that complaints are thoroughly investigated and corrective actions taken to eliminate the root cause of non-conformities to prevent recurrence?	MINOR	The factory maintained relevant CAPA records for customer complaints, but the follow up result for issued CAPA were not maintained.								

To be Completed by 3rd party - within 5 working days from Audit Date				To be Completed by Factory - within 10 working days from Audit Date			To be Completed by 3rd Party - within 2 working days from the receipt of CAPA from Factory		CAP Evidence Collection - To be Completed within 30 calendar days from last audit date		
1	2	3	4	5	6	7	8	9	10	11	12
Clause No.	Original Clause Requirement	Levels of Non-Conformance	Audit Findings	Corrective Action Plan	Responsible Persons	Due Date	Agreement with factory or Comments for Revision	Objective Evidences Required	Objective Evidences	CAPA Validation Results	Remarks
3.10.3	Are all relevant safety, legal, quality and complaint documents (e.g. QC, production, complaint, product safety records, etc.) shall be legible and retained in good condition for the time specified by customers or the factory QMS whichever is longer?	MINOR	The factory established document control procedure, the document storage areas were in good condition, and the documents such as quality instruction, work instruction, etc issue records were kept, but the documents retrieve records or documents disposal records were not available in the factory.								
3.10.4	All documents in use are the correct version?	MODERATE	Per onsite observation and document review, most of document like SOP in use were correct version. However, the work instruction for rubber refining process was without version control and recipe for powder mixing was without approval signature.								
4.2.1	Is a process flow diagram available?	MINOR	Process flow diagrams were established, however, no CCP (Critical Control Point) was identified on the process flow diagrams.								
4.4.6	Any personal jewelry or other objects prohibited in the production areas for the risk of product contamination?	MODERATE	Written procedure for jewelry control was established, but per onsite observation, two workers were wearing earring, bracelet and rings at production area.								
4.6.5	Are bait stations positioned to avoid potential contamination of materials and products? Are fly-killing devices and/or pheromone traps correctly sited and operational?	MINOR	Per onsite observation, the bait station, fly-killing lamp and mouse cage were correctly positioned, but it was found that one mouse cage set at outdoor of finished products warehouse was not put bait inside.								
4.7.1	Is there sufficient lighting in the factory, including the production floor, inspection areas, test areas, storage areas, maintenance areas, finishing and packing areas, etc.?	MINOR	Onsite test with lux meter, the lighting was insufficient at below area: vulcanization molding area (203 lux), inspection area in assembly and packing workshop (422 lux), and packing area (452 lux). (Audit requirement: Inspection Areas: ≥ 750 Lux; Production Areas: ≥ 550 Lux; Packing area ≥ 300Lux)								
4.8.1	Does the factory have control of the transport and storage of products, from delivery of raw materials and components, to finished product?	MINOR	Per onsite observation, the facilities that factory used for storage, transportation of materials, component and products were suitable and maintained in good condition. However, it was found the mixed plastic particle bags were stored on the floor at plastic particle mixing area, and the empty packaging cartons to be used for packing were stored on floor directly at packing area.								
4.8.3	Are tools and other sharp objects used in production controlled?	MODERATE	Sharp tools control procedure was established and required all sharp tools (e.g. scissors, blades) should be fastened to workbench, however, per onsite observation, it was respectively found one blade was not fastened to workbench at injection molding workshop and inspection area at assembly and packing workshop.								
4.8.6	Is the use of wood within raw material handling, preparation, processing, packing, and storage areas eliminated except when used in the product or where associated risks have been evaluated and controlled?	MODERATE	Risk of wood materials was not considered in process risk assessment report, and it was found two broken wooden pallets were used at incoming materials warehouse and packing area.								
5.5.2	Are vehicles loaded and unloaded in covered areas/bays to prevent the risk of contamination and damage?	MINOR	The loading and unloading area was not covered in the factory.								
6.1.2	Does a documented testing plan exist which includes sample size, frequency, test method and pass/fail criteria for all tests on raw materials, work-in-process and finished products, to ensure that the final product meets customer requirements?	MINOR	Testing plan including frequency, test method and pass/fail criteria for all tests was established, but the sampling size was not clearly defined.								
7.3.1	Has all equipment used in accept or reject activity been effectively calibrated?	MINOR	Randomly sampled three equipment used on site, it was found one electronic balance (number: 207) used at rubber refining area for color powder weighing was not calibrated after it was expired on Apr 21, 2022.								
7.4.5	Do machines, equipment, fixtures, tools and measurement equipment appear to be clean in good condition and well maintained?	MINOR	Per onsite observation, most of production machine appeared to be clean in good condition, but one set of rubber vulcanization machine was leaking oil.								

To be Completed by 3rd party - within 5 working days from Audit Date				To be Completed by Factory - within 10 working days from Audit Date			To be Completed by 3rd Party - within 2 working days from the receipt of CAPA from Factory		CAP Evidence Collection - To be Completed within 30 calendar days from last audit date		
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Clause No.	Original Clause Requirement	Levels of Non-Conformance	Audit Findings	Corrective Action Plan	Responsible Persons	Due Date	Agreement with factory or Comments for Revision	Objective Evidences Required	Objective Evidences	CAPA Validation Results	Remarks
8.3	Does the factory regularly identify training needs (including refresher training) for personnel performing work that affects product safety, legality and quality?	MINOR	No documented assessment of training needs was implemented in the factory.								
8.5	Are the personnel, who have a direct effect on the safety, quality or legality of products, trained to ensure understanding of risk assessment procedures or outcomes as necessary for their activity?	MODERATE	The factory had not provided the training for the employees who had a direct effect on the safety, quality or legality of products to ensure they were understanding of risk assessment procedures or outcomes as necessary for their activity, and no such training plan and records were kept.								

Version 04 - 25Mar2019

Costco Pre- Audit Questionnaire (PAQ)

Instruction:
1. Supplier/ Factory representatives must complete all the required fields(highlighted in yellow), put N/A if not applicable.
2. Supplier/Factory shall provide accurate informations to represent the factory to be audited. BV Auditor will verify during the audit.
3. Supplier/ Factory need to submit this completed PAQ to BV Coordinator at least 5 days before confirmed audit date.

1. Factory Overview

Factory Name	Hangzhou Freetron Industrial Co. ,LTD.
Factory Address	No.1117Chunjiang East Road, Economy Development Area of Tonglu, Zhejiang, China
Factory Phone Number	0571-58593753
Factory Fax Number	Nil
URL/Web Address	Nil
Name of Contact	yixianglou
E-mail address	tlluo@freetron.net
Year Established	2000
Number of Buildings	3
Factory GLN (Global Locator Number)	
Total Production Area M^2	4000
Warehouse Area M^2	2000
Does factory provide permission for 3rd party auditor to take photographs in all storage and production areas during Costco audit?	Yes

2. Personnel

2.1 Key Staff	Name	Tel	E-mail	Year(s) in Position at Company	Year(s) at Company
General Manager	Dong Weiwei	0571-58593751	dw@freetron.net	17 years	17 years
Quality/Technical Manager	Lu Linjun	0571-58597651	llj@freetron.net	15 years	15 years
Production Manager	Xie Weijun	0571-58593764	xwj@freetron.net	3 years	3 years
R & D Manager	Shu Kaixiang	0571-58592523	skx@freetron.net	14 years	14 years
Health & Safety Officer	Wen Xiaoli	0571-58593753	wxl@freetron.net	16years	16years
Security Representative/Officer	Wu Tao	0571-58593764	wt@freetron.net	3 years	3 years
Equipment Maintenance	Pan Yuezhong	18368018901	Nil	5 years	5 years
Others (please specify)					

2.2 Personnel / Headcount by Department

Department	Full time	Part time	Sub Total
PMC	1	0	1
Finance	3	0	3
Purchasing Department	2	0	2
Warehouse	3	0	3
factory headquarters	7	0	7
shipping business	1	0	1
Silica gel part	34	0	34
Administration Department	4	0	4
Technology Department	14	0	14
Mold room	7	0	7
Quality control department	14	0	14
Marketing Department	2	0	2
Maintenance department	5	0	5
Assembly department	52	0	52
Injection molding department	30	0	30
		Grand Total:	179

3. Export Markets

Markets	% of Total Business Volume
U.S. / North America	60%
E.U.	20%
Asia	20%
Others	
Domestic	

4. Key Clients (past 12 months)

Customers	% Business	Type of Products	Market(s)
OXO	50	Plastic and silicone commodities such as bags, boxes and lids, etc	USA\Britain
TPC	20	Plastic and silicone commodities such as bags, boxes and lids, etc	USA
PIC	10	Plastic and silicone commodities such as bags, boxes and lids, etc	USA
BergHoff	10	Plastic and silicone commodities such as bags, boxes and lids, etc	Belgium

5. Product Capabilities

Note: If your factory performs only re-packaging for Costco and does not manufacture any products for Costco, please mark section 5.1 and 5.2 as "Not Applicable".

5.1 What items the factory produced in past 12 months?

Product Category	Years of Experience Producing Product	Actual Units Shipped
Plastic and silicone commodities such as bags, boxes and lids, etc	8 years	5,000,000 pcs

5.2 What are the current items being produced?

Product Category	Material	Client	Ship date	Quantity (units)

Version 04 - 25Mar2019

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Instruction:
1. Supplier/ Factory representatives must complete all the required fields(highlighted in yellow), put N/A if not applicable.
2. Supplier/Factory shall provide accurate informations to represent the factory to be audited. BV Auditor will verify during the audit.
3. Supplier/ Factory need to submit this completed PAQ to BV Coordinator at least 5 days before confirmed audit date.

Plastic lids	PP+TPE	OXO	2022/09/02	12000 pcs

6. Production Capabilities

In case of power shortage, is back-up generator in place? No
If yes, how many and what is the capacity of each generator? N/A

6.1 List of Major Machinery / Utilities

Machinery	Type	Quantity	Condition
Mixing machine	Not provided	4	Fully operational
Extruding machine	Not provided		Fully operational
Rubber refining machine	Not provided	2	Fully operational
Vulcanization molding	100T/160T/330T/250T	22	Fully operational
Baking area	Not provided	2	Fully operational
Blow molding	Not provided	2	Fully operational
Injection molding	160T/200T/280T/320T/380T	31	Fully operational

6.2 List of Process being subcontracted

Process Subcontracted
Nil

6.3 List of All Main Materials used in past 12 months

Material Name	Imported (Y/N)	Country of Origin
Plastic particles	Y	Taiwan/Japan
Hardware	N	China
Rubber	N	China

7. Management Systems and Accreditation

(please attach copies of each)

Accreditation		Certifying Body	Date	Expiry
ISO 9001	Yes	Xingyuan Certification	6/20/2022	6/19/2025
ISO 14001	Yes	Xingyuan Certification	6/20/2022	6/19/2025
BRC Standard - Consumer Products	No			
Others (please specify):				

Is product certification done in terms of selling destination (e.g., UL for US, CCC for China, CE for Europe…) at the factory? No

if Yes, please specify	Certifying Body	Date	Expiry

8. Quality Control Management

Are QA/QC inspectors independent of production? Yes
Who does the QC/QA Manager/Supervisor report to? GM
How many QA/QC in total? 14

Name & Signature of Supplier Representative/ Title — COMPANY CHOP — Date

Name & Signature of Factory Representative/Title — COMPANY CHOP — Date

DIGITAL PHOTO FORM

Client	Costco
Vendor	Progressive International Corporation
Factory	Hangzhou Freetron Industrial Co., Ltd
Audit Date	Aug 22, 2022
Report No.	10222010520

Digital Photo Records

Photo 1) Factory gate

Photo 2) Factory name

Photo 3) Factory address

Photo 4) Sample showing room

Photo 5) Example products

Photo 6) Other products in the factory

Photo 7) Rubber storage area

Photo 8) Packaging materials warehouse

Photo 9) Plastic particle warehouse

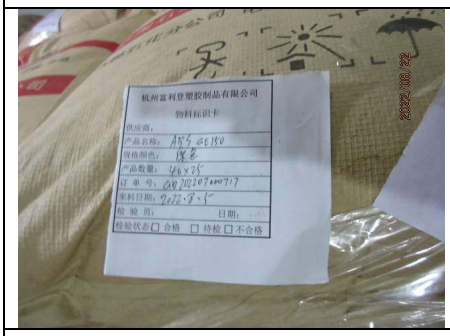

Photo 10) Identification label of plastic particle

Photo 11) Rubber refining workshop

Photo 12) Powder weighing area

DIGITAL PHOTO FORM

Client	Costco
Vendor	Progressive International Corporation
Factory	Hangzhou Freetron Industrial Co., Ltd
Audit Date	Aug 22, 2022
Report No.	10222010520

Photo 13) Refrigerator for storage of semi-finished rubber products

Photo 14) Vulcanization molding workshop

Photo 15) First piece sample provided at vulcanization molding area

Photo 16) Works instruction posted on vulcanization machine

Photo 17) Baking area

Photo 18) Vulcanization molds storage area

Photo 19) Tools shop

Photo 20) Trimming area

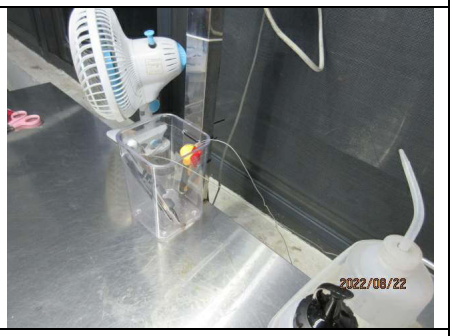

Photo 21) Sharp tools fastened to workbench at trimming area

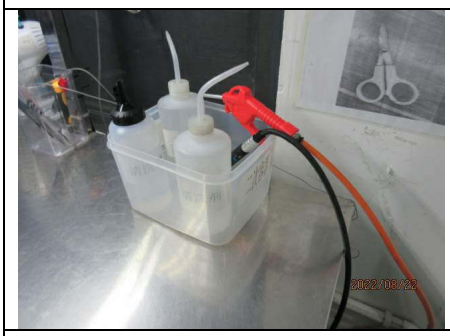

Photo 22) Cleaning chemical storage area at trimming area

Photo 23) MSDS posted at trimming area

Photo 24) Blow molding workshop

DIGITAL PHOTO FORM

Client	Costco
Vendor	Progressive International Corporation
Factory	Hangzhou Freetron Industrial Co., Ltd
Audit Date	Aug 22, 2022
Report No.	10222010520

Photo 25) Injection molding workshop

Photo 26) Pulverizing area

Photo 27) Injection mold storage area

Photo 28) Semi-finished product warehouse

Photo 29) Assembly and packing line

Photo 30) Assembly

Photo 31) Work instruction posted at assembly and packing area

Photo 32) First pieces sample provided at assembly area

Photo 33) Inspection at assembly and packing area

Photo 34) Water drinking area at packing area

Photo 35) Packing

Photo 36) Finished product warehouse

DIGITAL PHOTO FORM

Client	Costco
Vendor	Progressive International Corporation
Factory	Hangzhou Freetron Industrial Co., Ltd
Audit Date	Aug 22, 2022
Report No.	10222010520

		
Photo 37) Chemical warehouse	Photo 38) MSDS posted at chemical storage area	Photo 39) Fly-killing lamp at packing area
		
Photo 40) Laboratory	Photo 41) Heavy metal composition tester	Photo 42) Fluorescence spectrometer
		
Photo 43) Light box	Photo 44) Salt spraying tester	Photo 45) High temperature tester
		
Photo 46) Lid press durability tester	Photo 47) Microwave tester	Photo 48) Dishwasher test

DIGITAL PHOTO FORM

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Report No.	10222010520

Non-conformities

Photo 49) NC 2.2.6.7 Refining worker did not wear gloves

Photo 50) NC 2.2.6.7 Packing worker did not wear gloves

Photo 51) NC 3.6.2 One batch of products was not labeled PO number in semi-finished products warehouse

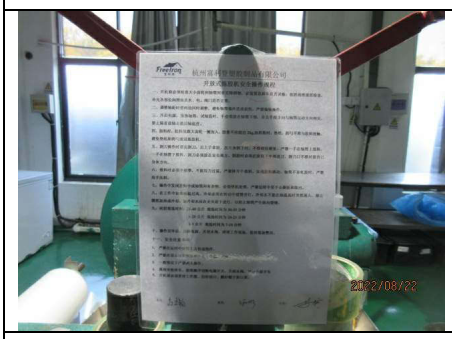

Photo 52) NC 3.10.4 Work instruction for rubber refining process without version control

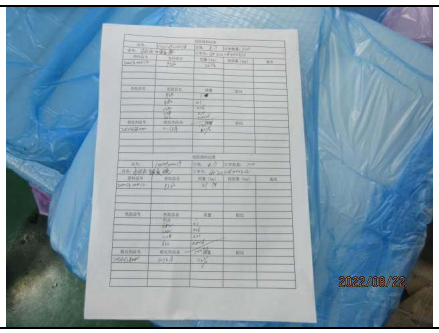

Photo 53) NC 3.10.4 Recipe for powder mixing without approval signature

Photo 54) NC 4.4.6 worker was wearing bracelet and rings at trimming area

Photo 55) NC 4.4.6 Worker was wearing ear ring at packing area

Photo 56) NC 4.6.5 Mouse cage in finished products warehouse without bait inside

Photo 57) NC 4.7.1 Insufficient lighting at vulcanization molding area (203 lux)

Photo 58) NC 4.7.1 Insufficient lighting at inspection area in assembly and packing workshop (422 lux)

Photo 59) NC 4.7.1 Insufficient lighting at packing area (452 lux)

Photo 60) NC 4.8.1 The mixed plastic particle bags were stored on floor directly

DIGITAL PHOTO FORM

Client	Costco
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Photo 61) NC 4.8.1 Empty packaging cartons were stored on floor directly at packing area

Photo 62) NC 4.8.3 One blade was not fastened to workbench at injection molding area

Photo 63) NC 4.8.3 One sharp tools used by inspector at assembly and packing workshop was not fastened to workbench

Photo 64) NC 4.8.6 Broken wooden pallet was used in raw materials warehouse

Photo 65) NC 4.8.6 Broken wooden pallet was used at packing area

Photo 66) NC 5.5.2 The loading and unloading area was not covered in the factory.

Photo 67) NC 7.3.1 Electronic balance (number 207) used for color powder weighing was not calibrated in time

Photo 68) NC 7.3.1 expiry date of electronic balance (number 207)

Photo 69) NC 7.4.5 One vulcanization machine leaking oil

DIGITAL PHOTO FORM

Client	Costco
Vendor	Progressive International Corporation
Factory	Hangzhou Freetron Industrial Co., Ltd
Audit Date	Aug 22, 2022
Report No.	10222010520

统一社会信用代码
91330100721065170J

营业执照

扫描二维码登录"国家企业信用信息公示系统"了解更多登记、备案、许可、监管信息

名　　称　杭州富利登塑胶制品有限公司
类　　型　有限责任公司(台港澳与境内合资)
法定代表人　刘兴贤
经营范围　生产和销售塑料日用品、硅胶日用品和五金模具制品。(依法须经批准的项目，经相关部门批准后方可开展经营活动)

注册资本　壹佰捌拾万美元
成立日期　2000 年 06 月 02 日
营业期限　2000 年 06 月 02 日 至 2040 年 06 月 01 日
住　　所　浙江省杭州市桐庐县桐君街道春江东路 1117 号

登记机关　桐庐县市场监督管理局
2021 年 10 月 29 日

国家企业信用信息公示系统网址：http://www.gsxt.gov.cn
国家市场监督管理总局监制

Photo 70)Business license

行为守则（第1页）

INSPECTION, AUDIT & ASSESSMENT

工厂廉政确认书

Bureau Veritas Hong Kong Limited,
7F Harbourside HQ, 7 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong

Tel: +852 2416 1222
www.cps.bureauveritas.com

检验/审核号码:	J0220/0520
厂商:	杭州富利盛制冷科技有限公司
检验/审核日期:	2022. 8. 22

尊敬的厂商，

必维国际检验集团消费品服务事业部 (以下简称 BV)致力于为海内外客户提供独立、公正客观的各类评估和检验服务，如实记录并向客户汇报评估及检验过程中的各种发现。为确保整个工作过程的有效进行，请您给予最好的合作。

BV 实施一套严格的道德行为规范，禁止员工直接或间接接受任何形式的礼物、报酬或好处。本行为守则呈递给贵公司管理层以告知 BV 代表在贵公司执行工作期间的行为规范。请阅读此文件并签名、盖章以确认您的理解和同意。

1. 任何情形下，遇到 BV 代表索要任何直接或间接形式的报酬或好处时，均不予理会并按以下联络方式直接联系 BV 办公室。如有其他与执行工作的 BV 代表相关的问题或关注，也请立即联系 BV 公司。

2. 任何情形下，不串通不贿赂 BV 的代表，不提供任何报酬、礼物或其他形式的好处给 BV 的代表。BV 将按行贿处理并向客户汇报厂商给予 BV 代表任何好处的行为，包括茶水费、辛苦费、感谢费或其他形式的好处，无论实际价值多少。

3. BV 一贯遵守当地的法律法规，包括遵守相关反腐败及反商业贿赂方面的法律法规。对于可疑的或实际的违法行为，BV 将汇报给当地执法部门或与其合作进行调查。

4. 在没有达到客户要求的检验和/或评估条件时，不对 BV 代表施加任何不合适的影响或者压力。不对 BV 代表施加任何不适当的影响或者压力去试图修改任何报告结果或记录。

5. 为证实评估或者检验的工作发现，BV 代表在执行工作时将根据需要对工厂的设施、检验的产品或评估/检验的各个过程进行拍照。请确保不阻碍拍照过程的正常进行。BV 将对执行工作过程中收集的文件、图片及其它信息严格地保密。

6. 提供良好、安全的工作环境使 BV 代表得以顺利地工作。例如，产品检验时，请协助确定待检产品的位置及搬运和开箱等工作；对于工厂评估，提供合适安全的工作场所进行员工面谈工作；同时告知危险因素并提供合适的个人防护设备(PPE)，对可能遇到的危险提供必要的培训。按照 BV 的安全要求“2 分钟的安全检查表”，BV 代表将检查检验和评估的工作环境。如果发现有任何可能对检验员和审核员安全和健康造成的隐患，且工厂无法排除这些隐患时，BV 代表有权中止服务。

7. 我们请求厂方只派遣授权代表在检验/审核地点配合 BV 工作，以免造成拥挤。工作完成后，发现的问题只讨论一次，因此请厂方安排授权代表参加末次会议。

8. BV 代表写完报告后，请厂方授权代表在报告上签字以确认知晓 BV 代表的工作的进行情况和结果发现等。某些情况下，应客户要求 BV 代表需要直接从工厂将手写报告和数码照片传出，请给予此方面的协助。

9. 产品检验工作完成后，BV 代表会要求取走一些出货样品以便日后参考。

10. 我们有时会安排见习职员跟随资深职员到工厂访问。根据需要，翻译人员也会陪同到访。但这种安排既不会产生额外的人工费用，也不会影响到检验的最终结果。

11. 为[illegible]工作按要求进行，我们可能会派出特殊检验/审核人员来执行工作或派其他 BV 代表来检查工作和现场监督，所有违[illegible]的行为均将被呈报给客户。

12. 如[illegible]/ 的工作被你们工厂的监控系统拍摄下来，其内容不能侵犯 BV 员工的隐私。这些记录只能做为内部安全用途，没有B[illegible]面许可，不能复制或分享给任何外部团体，包括用于索赔或诉讼。

2022/08/22

行为守则（第2页）

INSPECTION, AUDIT & ASSESSMENT

工厂廉政确认书

Bureau Veritas Hong Kong Limited,
7F Harbourside HQ, 7 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong

Tel: +852 2416 1222
www.cps.bureauveritas.com

第一部分：工厂声明（BV代表解释行为守则后由工厂填写）：

我们在此声明，已经收到BV的行为守则，并由BV代表 刘/赵 先生/女士于(日期) 2022.8.22 (时间) 8:50 向我们解释了其内容，我们已阅读和理解以上内容，以及清楚BV廉政措施的精神和目的。来执行工作的BV代表如下（包括工作过程中全程现场监督的人员）：

刘慧慧 / 赵亚强

罗翔
厂方代表签名

0571-58593753
厂方代表联系电话

第二部分：工厂声明 (工作完成后由工厂填写，如机密信息需报告，可将详细信息直接发至邮箱 ethics@hk.bureauveritas.com)：

项目	请声明是否提供下列好处 给 BV 代表 ✓	是	否	项目	请声明是否提供下列好处 给 BV 代表 ✓	是	否
A	膳食	☐	☑	B	交通	☐	☑
C	住宿	☐	☑	D	金钱	☐	☑
E	礼物	☐	☑	F	其它好处	☐	☑
详细说明免费或有偿提供相关好处的情况							

G	关于咨询公司的声明 ✓	是	否	详细说明咨询公司的情况
关于本次检验/审核，是否有咨询公司联系贵公司？		☐	☑	
关于本次检验/审核，贵公司是否使用了咨询公司的服务？		☐	☑	

我们在此声明，以上信息是真实准确的，我们理解BV可向客户或当地执法部门汇报疑似违规或违法行为。

同时，BV 代表向我们解释了工作中发现的问题，并且我们认同这些问题。

罗翔
厂方代表签名

罗翔 副厂长
厂方代表姓名和职位

2022.8.22 16:00
时间和日期

浙江利普检测设备有限公司 Zhejiang Freelon Industrial Co.,Ltd. 3306221000****

盖章

2022/08/22

关于投诉或建议，请联系:

廉政投诉邮箱: Ethics@hk.bureauveritas.com

Jamey Appler
副总裁兼消费品事业部
法律总顾问、风险及合规官
电话: +1 716 505 3582
电邮: jamey.appler@us.bureauveritas.com

CODE OF CONDUCT (page 1)

INSPECTION, AUDIT & ASSESSMENT

Factory Integrity Acknowledgment

Bureau Veritas Hong Kong Limited,
7F Harbourside HQ, 7 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong.

Tel: +852 2418 1222
www.cps.bureauveritas.com

Inspection / Audit No.:	
Factory / Supplier:	
Inspection / Audit Date:	

Dear Supplier,
Bureau Veritas, Consumer Products Services Division provides independent, impartial and objective assessment and inspection services for our global clientele. Our assessment and/or inspection findings will be duly recorded and reported to our clients. We request your cooperation to enable us to effectively execute this process.

We operate a strict Code of Ethics, which prohibits the direct or indirect acceptance of gifts, payment or benefit in any form. This Code of Conduct letter is presented to the management of your facility for the purpose of setting out acceptable conduct whilst our representatives perform their job at your facility. We ask that you read this document and sign it to confirm your understanding and agreement.

1. Never, under any circumstances, give in to demands or requests for benefits or payments from a BV representative. If a BV representative asks for any direct or indirect benefit, you must contact the BV office or the contact details below. You must also contact BV immediately for any other issues or concerns on the BV representative/s assigned for the service.

2. Never, under any circumstances, collude or offer a facilitation payment, bribe, gift or any other benefit to a BV representative. Any benefit given to a BV representative will be construed as a corrupt practice and will be reported to our client. This includes "tea money", "hardship appreciation", or any other benefits regardless of the actual value.

3. BV is committed to fully complying with local laws and regulations, including such on anti-corruption and bribery. Where appropriate, BV will not hesitate to alert or cooperate with law enforcement authorities on suspected or actual offenses.

4. Do not put any undue pressure on our representatives to execute their work if conditions stipulated by the client are not met. Also, do not put any undue pressure on our representatives to amend the results or recording of their findings.

5. During the work execution, our representatives may be required to take photos of the factory facilities, products being inspected or assessment/inspection processes in order to validate findings. Please ensure this process is not obstructed. Documents, pictures, or any other information gathered during the course of the BV service will be kept confidential.

6. Provide a safe environment that allows BV representatives to do their job properly. This may mean assistance with locating, moving and opening cartons for inspections and arranging a private and suitable place for audits. It also means pointing out any safety hazards, and providing appropriate personal protective equipment and necessary training regarding any risk that may be encountered. BV representatives will check the working environment in accordance with BV's safety requirements in the "2 Minutes for my safety assessment form". In case potential risks are identified, which may jeopardize auditors' and inspectors' health or safety, they have the right to discontinue the services if you cannot eliminate such risks.

7. We require factory to assign only authorized personnel to be present in the inspection / audit room to coordinate during BV services, so that there is no overcrowding. After completion of the service, the findings will be discussed only once and therefore factory should arrange their authorized personnel to be present during the closing meeting.

8. We require only authorized factory representative to sign the report prepared by our representatives to acknowledge the execution of their work and findings.

9. In some cases we are asked by client to submit hand written reports and digital images from the factory and would request that our representatives use your facilities. With regards to inspections, our representatives will request to take shipment samples for verification.

10. Trainee(s) may accompany senior inspectors /auditors on the visit to your factory. If needed, an interpreter may also accompany the BV representative. Their presence will neither result in additional charges to you, nor affect the final results.

11. To ensure that services are performed in compliance to the requirements, we may send mystery inspectors/auditors to perform services or other BV representatives to perform surprise checks, onsite observations and report to our client any deviations or breach of the policy.

CODE OF CONDUCT (page 2)

INSPECTION, AUDIT & ASSESSMENT

Factory Integrity Acknowledgment

Bureau Veritas Hong Kong Limited,
7F Harbourside HQ, 7 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong.

Tel: +852 2418 1222
www.cps.bureauveritas.com

12. If the BV inspection service is being filmed on any surveillance camera in your factory, the recording should not infringe the privacy rights of the BV employee/s. The recording should only be used for internal security purposes, and shall not be reproduced or shared with any external party, including to support any claim or litigation, without the written consent of Bureau Veritas.

PART 1: Factory declaration (To be filled by the factory once BV COC is explained by the BV staff).

We confirm that we received the BV Code of Conduct and that the contents were explained by the BV representative, Mr./ Ms. _____ on __DDMMYY___at __HHMM___ and we understand the contents, spirit and intent of the BV procedure on Integrity. The following BV representatives were present during the service (including onsite observers present full time during the service):

_____.

_____ _____

Signature of Factory Representative **Factory Representative's contact number**

PART 2: Factory declaration (To be filled by the factory after completion of the service. In case there is anything to declare confidentially, specific details can be sent directly to ethics@hk.bureauveritas.com).

Item	Please declare if benefits were offered to the BV staff ✓	Yes	No	Item	Please declare if benefits were offered to the BV staff ✓	Yes	No
A	Meals	☐	☐	B	Transportation	☐	☐
C	Accommodation	☐	☐	D	Money	☐	☐
E	Gifts	☐	☐	F	Other Benefits/Favors	☐	☐
Explain details of free or subsidized benefits offered							

G	Please declare about use/role of consultants ✓	Yes	No	Explain details of the consultant
Were you contacted by a consultant for this inspection/audit?		☐	☐	If yes, please specify when, who and why.
Have you used a consultant's services for this inspection/audit?		☐	☐	If yes, please specify when, who and why.

We acknowledge that the above information is true and accurate. We understand that BV could and will report to program clients and/or law enforcement authorities any suspected improprieties or illegal activities. ☐

We also acknowledge that the BV representative/s explained the findings of the service and we agree with it. ☐

_____ _____

Signature of Factory Representative **Name and Designation**

_____
Date and Time

_____
Company Chop

Please contact the following to make any complaints or suggestions:

Complaints mailbox: Ethics@bureauveritas.com

Jamay Appler
Vice President & CPS General Counsel,
Risk and Compliance Officer

Tel: +1 716 505 3582
Email: jamay.appler@bureauveritas.com