

1.0 Purpose 目的

The purpose of this document is to establish a procedure for controlling the integrity issue to ensure the audit is performed under impartial environment and meet customer expectations.

本文件的目的是建立一个控制廉正问题的程序，以确保审核在公正的环境下进行并满足客户的期望。

2.0 Scope 范围

This procedure covers all technical staff within Leverage Limited, including social audit, environmental audit, and security audit groups, inspection groups, testing groups and the personnel who take responsibility to manage and control the quality of activities and services, including auditors, report reviewers, specialist, marketing team, customer services team, etc.

该程序涵盖公司内的所有技术人员，包括社会审核，环境审核和安全审核小组，验货组，测试组以及负责管理和控制活动和服务质量的人员，包括审核员，报告审查员，专家，营销团队，客户服务团队等。

3.0 Responsibility 责任

3.1 All the LVG Staff 全体 LVG 人员

3.1.1 All staff that has direct contact with clients or factories is to be mindful of their behavior. Unprofessional behavior will lead to a negative perception of, and damage the company's business reputation. However, positive work behavior will lead to a positive reinforcement of the company's professional brand and image. It is the responsibility of the LVG personnel to understand and follow the guidelines outlined in this document.

所有与客户或工厂有直接联系的员工都应注意他们的行为。不专业的行为会导致对公司商业声誉的负面看法，并损害公司的商业声誉。积极的工作行为会强化公司专业品牌和形象。LVG 人员有责任理解并遵守本文件中概述的准则。

3.2 General Manager 总经理

3.2.1 Define the integrity policy, principle and criteria of job rotation, phone call audit, "mystery" audit and investigation on integrity compliant;

确定廉正政策，原则和工作轮换，电话审核，“神秘”审核和诚信合规调查的标准；

3.2.2 Review and approve the report on integrity issue. Monitor the result of LVG controls on integrity;

审查和批准关于诚信问题的报告。监控 LVG 廉正控制的结果；

3.2.3 Make judgement on the follow-up action for the investigated and confirmed integrity issue;

对调查和确认的廉正问题的后续行动作出判断;

3.3 ISC Committee/ Integrity officer 公正性委员会/廉正调查官

3.3.1 Maintain the LVG integrity program and report to General Manager for Integrity issue;

维护 LVG 廉正计划并向总经理报告廉正问题;

3.3.2 Communicate LVG Integrity policy and program with relevant clients including purpose, process and complaint channel;

与相关客户沟通 LVG 廉正政策和计划, 包括目的, 流程和投诉渠道;

3.3.3 Monitor the job rotation of audit and raise the concern when necessary;

监督审核工作轮换, 必要时提出关注;

3.3.4 Monitor the result on random phone call audit and the concern when necessary;

监控随机电话审核的结果, 必要时关注;

3.3.5 Perform the mystery audit basis on the plan;

按计划进行神秘审核;

3.3.6 Perform the investigation when integrity complaint receipt;

收集廉正投诉后进行调查;

3.3.7 Communicate the integrity issue with other department, including operation team, CS team, marketing team, General Manger etc.;

与其他部门沟通廉正问题, 包括运营团队, CS 团队, 营销团队, 总经理等;

3.4 Operation Department 运营部门

3.4.1 CS Team CS 团队

3.4.1.1 Assist to communicate with the factories when there is "Mystery" audit;

在进行“神秘”审核时, 协助与工厂沟通;

3.4.1.2 Assist the Integrity team to perform the random phone call audit;

协助廉正团队进行随机电话审核;

3.4.1.3 Assist to communicate with client on Integrity issue when necessary;

在必要时协助与客户就廉正问题进行沟通

3.4.2 Scheduling Team 排单人员

3.4.2.1 Provide the updated schedule of audit to integrity team for arrange random phone call audit, "Mystery" audit;

向廉正团队提供更新的审核时间表，安排随机电话审核，“神秘”审核；

3.4.3 Audit Team 审核团队

3.4.3.1 Strictly follow the LVG Integrity policy;

严格遵守 LVG 廉正政策

3.4.3.2 Cooperate integrity team on "Mystery" audit;

协同廉正团队进行“神秘”审核

3.4.3.3 Assist integrity team to investigate the integrity complaint and provide all the information known to integrity team;

协助廉正团队调查廉正投诉，并提供廉正团队所知的所有信息；

3.5 Human Resources 人事

3.5.1.1 Assist and provide support to Integrity team on integrity issue investigation;

协助廉正团队进行廉正问题调查并提供支持；

3.5.1.2 Take action on the personnel appointment basic on the decision from top management on investigated and confirmed integrity issue;

根据最高管理层关于调查和确认廉正问题的决定，对人事任命采取行动；

3.6 Auditor and employee are required acknowledgement and on-going and continuing training on the subject, policy, process and required actions.

审核员和员工需要对主题，政策，流程和所需行动进行确认和持续培训。

4.0 REFERENCES 参考文献

Not applicable 不适用

5.0 TERMINOLOGY 术语

LVG	Leverage Limited
CS	Customer Services
MV	Mystery Visits, including mystery audits.
SOP	Standard Operating Procedure
Employee	Person who is hired by LVG.



Integrity Procedure

廉正程序

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Report Review Team	Report Review Team / Report Reviewer is the technical staff who is responsible for reviewing reports of social audit, security audit, environmental audit.
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6.0 PROCEDURE 程序

6.1 Trust and Integrity 信任和廉正

The trust, integrity, honesty and transparency are important and the basis for establishing long-term business relationship with all our stakeholders. All of our business partners are accountable, including but not limited to factories, vendors, retailers, brands etc.;

信任，廉正，诚实和透明是重要的，也是与所有利益相关者建立长期业务关系的基础。我们所有的业务合作伙伴都有责任，包括但不限于工厂，供应商，零售商，品牌等；

6.2 Integrity Program Management 廉正管理

6.2.1 The key ingredient of being a respected independent audit and assessment organization is impartiality driven by trust and integrity. Without this the Leverage brand has no value. Without value we can never be a world leader in our business. It is therefore critical that all employees are honest & ethical which means adhering to the following basic guidelines:

作为受人尊敬的独立审核和评估机构的关键要素是由信任和廉正驱动的公正性。没有这个，Leverage 品牌就没有价值。没有价值，我们永远不可能成为我们业务的世界领导者。因此，所有员工都必须诚实和道德，这意味着遵守以下基本准则：

6.2.2 Understand that LVG have a zero tolerance policy on integrity – no compromises;

了解 LVG 对廉正的零容忍政策 - 没有妥协；

6.2.3 Never under any circumstance ask or accept a facilitation payment, bribe, gift or benefit from factories;

在任何情况下都不得要求或接受工厂的便利付款，贿赂，礼品或利益

6.2.4 Never under any circumstances give in to demands or request to modify or change results and/or findings;

在任何情况下都不得屈服于要求或要求修改或更改结果；

6.2.5 If put under pressure by the factory, please phone back to office and report the incident;

如果工厂施压，请电话汇报办公室；

6.2.6 LVG requires personnel, internal and external, to reveal any situation known to them that can present them or the company with a conflict of interests. LVG records and uses this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that

employ them, and shall not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interest.

LVG 要求内部和外部人员披露他们所知的任何可能使他们或公司存在利益冲突的情况。 LVG 记录并使用这些信息作为识别这些人员或雇用他们的组织的活动所引起的公正性威胁的输入，并且不得使用这些内部或外部人员，除非他们能证明没有利益冲突。

6.2.7 It's everybody's responsibility to protect our company. Hence, everyone needs to monitor everyone. If you suspect or have evidence of internal corruption within LVG, please do as follows:

保护公司是每个人的责任。因此，每个人都需要监控每个人。如果您怀疑或有 LVG 内部腐败的证据，请执行以下操作：

6.2.7.1 Report immediately to HR, Operation Manager;

立即向人事部，运营经理报告；

6.2.7.2 Alternatively, report to LVG General Manager;

或者向 LVG 总经理汇报

6.2.8 The LVG Integrity Program is based on three principles and seven controls:

LVG 廉正计划基于三个原则和七个控制：

6.2.8.1 Principles 原则

6.2.8.1.1 INDEPENDENCE 独立性

The integrity line is operated independent and directly report to top management;

廉正组独立运作，直接向最高管理层报告；

6.2.8.1.2 ZERO TOLERANCE 零容忍

The deviation from Code of Ethics is zero tolerance;

偏离道德准则是零容忍；

6.2.8.1.3 TOTAL TRANSPARENCY 全面透明

All the information on integrity program and integrity issue is transparent and public to all stakeholders of LVG;

关于廉正计划和诚信问题的所有信息都是透明的，并向 LVG 的所有利益相关者公开；

6.2.8.2 Controls 控制

6.2.8.2.1 Reference check at time of employment;

雇用时的参考检查

6.2.8.2.2 Job rotation and limited authority;

工作轮换和有限权限;

6.2.8.2.3 Impartiality / integrity declaration and confidentiality commitment;

公正性/廉政声明及保密承诺

6.2.8.2.4 Random phone call audit;

随机电话审核

6.2.8.2.5 Mystery Audit;

神秘审核

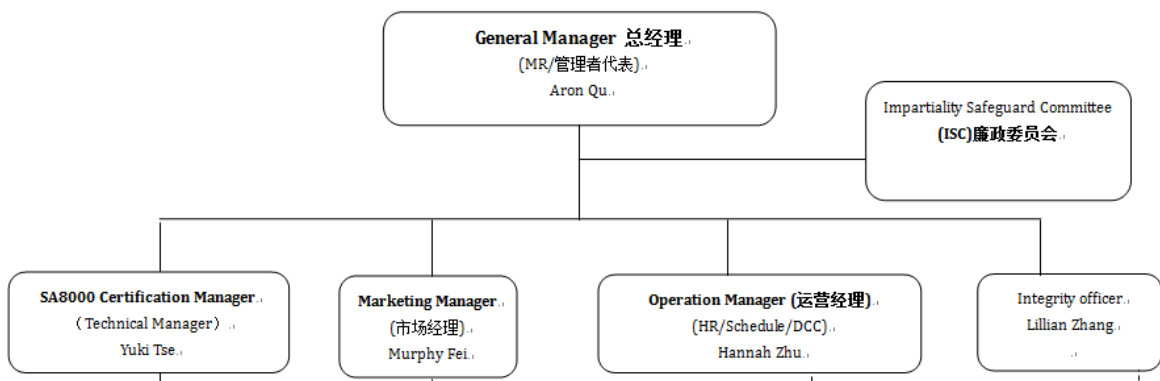
6.2.8.2.6 Investigation on Complaint;

投诉调查

6.2.8.2.7 Complaint channels;

投诉渠道

6.2.9 Organization for Integrity Controls 廉正控制组织架构



6.2.10 Code of Integrity Guidelines 廉正方针指引

6.2.10.1 Interaction and Communication with Factory Representatives

与工厂代表的互动和沟通

6.2.10.1.1 All auditors are to always introduce themselves politely to factory representatives, whether by telephone, fax, in writing, or in person. Auditors are not allowed to share their personal telephone, e-mail address to auditees. Company centralized e-mail address and office phone number are to be shared to the auditees for their contact if they have any question about the audit. Auditors are not allowed to contact / be contacted with auditees before and after the audits unless approval from their direct supervisor obtained;

所有审核员应始终礼貌地向工厂代表介绍，无论是通过电话，传真，书面还是亲自。审核员不得与受审核方共享他们的个人电话，电子邮件地址。如果对审核有任何疑问，公司集中的电子邮件地址和办公室电话号码将与受审核方共享。除非获得其直接主管的批准，否则审核员不得在审核前后与受审核方联系/联系;

6.2.10.1.2 All auditors are to be punctual for the scheduled services. They are to inform their scheduler ahead of time, if they are going to arrive late at the factory;

所有审核员应准时服务。如果他们要迟到达工厂，他们应提前告知他们的日程安排人员；

6.2.10.1.3 All auditors are to wear the company badge (company Identification Card shall be issued to all employees) and/or present their business cards to factory representatives when visiting factories;

所有审核员均应佩戴公司徽章（公司名片应发给所有员工）和/或在访问工厂时向工厂代表出示其名片；

6.2.10.1.4 All auditors are to inform factory representatives of all the relevant information concerning the services, as well as LVG audit operating procedures;

所有审核员都应通知工厂代表有关服务的所有相关信息，以及 LVG 审核操作程序；

6.2.10.1.5 All auditors are to comply with factories' rules and regulations (e.g. not entering restricted areas, wearing visitor badges, complying with safety requirements, etc.);

所有审核员应遵守工厂的规章制度（例如不进入限制区域，佩戴访客徽章，遵守安全要求等）；

6.2.10.1.6 All auditors are to ask for factory representatives' cooperation in a polite manner, and not in a manner that could be construed as authoritative (e.g. when assistance is required to move cartons, unpack goods, document checks, audit tour, etc), or arrogant;

所有审核员都应以礼貌的方式询问工厂代表的合作，而不是以可被视为权威的方式（例如，需要协助搬运纸箱，打开货物，文件支票，现场审核等）或傲慢；

6.2.10.1.7 All auditors are to explain to factory representatives patiently and with complete impartiality the result of the services;

所有审核员应耐心，完全公正地向工厂代表解释服务结果；

6.2.10.2 Conflict with Manufacturer 与工厂发生冲突

6.2.10.2.1 When an auditor is confronted with an unreasonable or a problematic person during the execution of his / her work, or faced with a situation which may result into conflict, he / she is to keep his / her composure, perform the services according to normal procedure, and report the incident to his / her direct supervisor immediately;

当审核员在执行工作期间遇到不合理或有问题的人，或遇到可能导致冲突的情况时，他/她应保持冷静，执行按照正常程序提供服务，并立即向其直接主管报告；

6.2.10.2.2 All auditors are to be calm, professional and impartial at all times and report the Non-compliance(s) to the client without allowing factory representatives to influence their decision;

所有审核员应始终保持冷静，专业和公正，并在不允许工厂代表影响其决策的情况下向客户报告不合规情况；

6.2.10.2.3 If an auditor is treated inappropriately and unreasonably by the factory representative/s, they are to report the incident to his / her direct supervisor immediately. The direct supervisor is to communicate with the factory to clear any misunderstanding. If the factory refuses to cooperate, the supervisor shall try to get the vendor's / client's help to ease the situation and to complete the audit. At the same time, the supervisor shall report the incident to the relevant manager. The manager is to decide if the services must proceed or be aborted;

如果审核员被工厂代表不恰当和不合理地对待，他们应立即向其直接主管报告该事件。直接主管与工厂沟通，以消除任何误解。如果工厂拒绝合作，主管应尝试获得供应商/客户的帮助以缓解情况并完成审核。同时，主管应将事件报告给相关经理。经理将决定服务是否必须继续或中止。

6.2.10.3 Benefit from the 3rd Parties – Factories, Suppliers and Customers 第三方利益 - 工厂，供应商和客户

6.2.10.3.1 LVG staff is strictly forbidden from receiving any kind of gifts, money, souvenirs or benefits from factories, suppliers or customers for any reason;

LVG 工作人员严禁以任何理由从工厂，供应商或客户那里收到任何礼品，金钱，纪念品或福利；

6.2.10.3.2 As a general rule auditor MUST NOT request for transport from factory. However, where the factory is in a remote location where public transport is not available, the factory is difficult to find or it is too late in the evening for public transport to be available then such arrangement can be accepted with full disclosure. That means the auditor's direct supervisor is to aware of this practice and it has been approved. Auditor is to pay for the transport;

作为一般规则，审核员不得要求接送。但是，如果工厂位于无法使用公共交通工具的偏远地区，工厂很难找到，或者晚上公共交通工具太晚，那么这种安排可以在完全公开的情况下接受。这意味着审核员的直接主管应了解这种做法，并且已经获得批准。审核员支付交通费。

6.2.10.3.3 All auditors are to bring enough money to cover all the expenses necessary for the service execution. They are not to borrow the money from factory representatives at all times;

所有审核员应携带足够的资金来支付服务执行所需的所有费用。他们不能向工厂代表借钱；

6.2.10.3.4 LVG staff is not to accept any form of entertainment from factory representatives;

LVG 工作人员不得接受工厂代表的任何形式的娱乐活动；

6.3 Recruitment – Reference Check 招聘 - 参考检查

6.3.1 HR is to associate for ensuring eligible job applicants are ethically fit for employment by means of reference checks with their previous employers. The reference check is to be performed to every employee. For the sensitive position, including auditor, report review team, scheduling team, the background check related to integrity is to be performed. And HR is to share the information from reference and background check to Operation Manager during recruitment process;

人事部应通过与之前雇主的参考检查来确保合格的求职者在道德上适合就业。将对每个员工执行参考检查。对于敏感职位，包括审核员，报告审核小组，排单组，将执行与廉正相关的背景调查。人事部在招聘过程中将参考和背景调查信息分享给运营经理；

6.4 Job Rotation for Audit 审核工作轮换

6.4.1 Job rotation for audit is to be implemented to minimize the risk of collusion between factory staff and LVG employees; 实施审核工作轮换，以尽量减少工厂员工与 LVG 员工勾结的风险；

6.4.1.1 By considering existing limitations, such as quality of services and clients' qualification requirements, rotating auditor as much as possible to reduce their visit frequency to any factory, so as to minimize the risk of potential integrity issues;

通过考虑服务质量和客户资格要求等现有限制，尽可能轮换审核员以减少对任何工厂的访问频率，从而最大限度地降低潜在廉正问题的风险；

6.4.1.2 The scope of job rotation is to be limited to every individual scheduler's specific geographic area, unless otherwise required;

除非另有要求，工作轮换的范围应限于每个调度员的特定地理区域；

6.4.1.3 CS is to prepare and update lists of qualified auditor approved by clients, and provide the lists to relevant scheduler;

CS 应准备和更新客户批准的合格审核员名单，并将清单提供给相关的调度员；

6.4.1.4 Each scheduler is to rotate auditor when scheduling audit to minimize consecutive visits by the same auditor to factories. The rotation criteria shall be:

每个调度员在安排审核时轮换审核员，以尽量减少同一审核员对工厂的连续访问。轮换标准应为：

6.4.1.4.1 When there is more than 1 auditor, who are qualified for the required audit, the auditor is to be rotated amongst factories for product line (electric & electronic, factory assessment, social audit or others).

当有超过 1 个审核员有资格进行要求的审核时，审核员应在工厂之间轮换产品线（电气和电子，工厂评估，社会审核或其他）。

6.4.1.4.2 When there is only 1 qualified auditor, in a local office, rotation is not applicable.

当只有 1 名合格的审核员时，在当地办公室，轮换不适用。

6.4.1.5 When job rotation is applicable, the assignment of auditor to factories is to be on a random basis. The scheduler is to ensure all available and qualified auditor have equal chances to visit the factories;

当工作轮换适用时，审核员对工厂的分配应随机进行。调度员应确保所有可用且合格的审核员有同等机会参观工厂；

6.4.1.6 When there are only a small number of qualified auditors in an office, e.g., 2 or 3, and a significant increase in travel expense is foreseen for the job rotation, rotation is not compulsory;

如果办公室中只有少数合格的审核员，例如 2 或 3 个，并且预计工作轮换的旅行费用会大幅增加，则轮换不是强制性的；

6.4.1.7 The scheduling of auditors is to be reviewed and monitored to track auditors' historical visits to each factory. The job rotation policy is to be applied to all audit and inspection services;

应审核和监控审核员的时间安排，以跟踪审核员对每个工厂的历史访问。工作轮换政策适用于所有审核和验货服务；

6.4.1.8 The schedule will not be changed by anyone without reasonable cause. Job rotation is executed limited to the parameters of the program as agreed with the client;

没有合理原因的人不得更改时间表。根据与客户的约定，执行作业轮换仅限于程序的参数；

6.4.1.9 Job rotation is to be monitored by Operation Manager through operational database system. And the General Manager is to monitor the audit schedule on monthly basis. The Operation Manager is to review and provide the approval for the audit schedule on weekly basis;

运营经理通过操作数据库系统监视工作轮换。总经理将每月监控审核时间表。运营经理将每周审核并提供审核计划的批准；

6.4.1.10 Every 6 months, top management is to review the status and effectiveness of job rotation. If needed, the tools on rotation is to be updated;

最高管理层每 6 个月审查一次轮岗的状态和有效性。如果需要，将更新轮换工具

6.5 Limiting the Power of Auditor 限制审核员的权力

6.5.1 There is the technical personnel for reporting actual situation of audited factory. The audited factory's situation and Non-Compliance(s) are to be found during the audit and raised in the report;

有报告审核工厂实际情况的技术人员。审核工厂的情况和不合规情况应在审核过程中找到并在报告中提出；

6.5.2 The audit report included information on audited factory's situation and Non-Compliance(s) is to be reviewed by LVG Report Review Team after the submission by auditor. The final report is to be sent to client by LVG Report Review Team. The auditor's power is limited and monitored by the other team of LVG;

审核报告包括审核工厂情况和不合规情况的信息，由审核员提交后由 LVG 报告审核小组审核。最终报告将由 LVG 报告审核小组发送给客户。审核员的权力受到 LVG 其他团队的限制和监督；

6.6 Impartiality / integrity declaration and confidentiality commitment;

公正性/廉政声明及保密承诺

6.6.1 The LVG Impartiality/integrity declaration and confidentiality commitment is established for listing and explaining the LVG integrity policy on audit to client / factory. It clearly declares that client / factory and auditor are to follow the integrity strictly.

建立 LVG 公正性/廉政声明及保密承诺，用于列出和解释 LVG 对客户/工厂审核的廉正政策。它明确声明客户/工厂和审计员严格遵守诚信。

6.6.2 LVG Impartiality/Integrity declaration and confidentiality commitment covers every audit service assignment.

LVG 公正性/廉政声明及保密承诺涵盖每项审核服务任务。

6.6.2.1 For every audit, the auditor is to present and explain the LVG Impartiality/Integrity declaration and confidentiality to factory management during opening meeting;

对于每次审核，审核员应在开始会议期间向工厂管理层介绍并解释 LVG 公正性/廉政声明及保密承诺；

6.6.2.2 The client / factory involved in the audit is to read the LVG Integrity Code of Engagement Declaration, understand it, sign it, stamp company chop on it and adhere to it.

参与审核的客户/工厂应阅读 LVG 诚信守则声明，理解，签署，盖章并加以遵守。

6.7 Random Telephone Audit 随机电话审核

6.7.1 The monthly target of the phone call audit is 10% of the factories that are going through audits and jobs on a monthly basis, unless otherwise specified;

除非另有说明，否则电话审核的月度目标是按月进行 10% 工厂的审核；

6.7.2 Phone call audits are to be performed in factories where live audit is being performed or on the following day of the service. The records are to be marked in the Random Telephone Audit Report;

电话审核应在正在进行实时审核的工厂或服务的第二天进行。记录将在随机电话审核报告中标明；

6.7.3 Based on the Random Telephone Audit Report, Integrity officer is to review together with Operation Manager to identify suspicious auditors. If needed, the increased frequencies of phone call audits are to be performed to those suspicious auditors. Besides this consideration, the phone call auditor should also pick factories at random;

廉正官根据随机电话审核报告，与运营经理一起审核，以识别可疑审核员。如果需要，将对那些可疑审核员执行增加的电话审核频率。除此之外，电话审核员还应随意选择工厂；

6.7.3.1 At the beginning of the phone call audit, the phone call auditor should introduce the purpose of the phone call, find out and speak to the person who is in charge and/or coordinating the audit. The phone call auditor is to ask all the questions on the Random Telephone Audit Report, few of the key ones being:

在电话审核开始时，电话审核员应介绍电话的目的，找出并与负责人和/或协调审核联系。电话审核员将询问随机电话审核报告中的所有问题，其中一些关键问题是：

6.7.3.1.1 When did the auditor arrive at the factory?

审核员是什么时候到达工厂的？

6.7.3.1.2 When did the auditor leave the factory?

审核员是何时离开工厂的？

6.7.3.1.3 Did the factory provide transport to the auditor? If yes, please specify.

工厂是否向审核员提供交通工具？如果是，请详细说明

6.7.3.1.4 Did the auditor give their business cards to the factory?

工厂是否给工厂发送名片？

6.7.3.1.5 Was the Integrity Code of Engagement Declaration presented and explained?

是否向工厂展示廉正保密公正声明并解释？

6.7.3.1.6 Where did the auditor have lunch?

审核员在哪里用午餐？

6.7.3.1.7 How does the factory evaluate the auditor's attitude and performance?

工厂怎么评价审核员的态度和行为？

6.7.3.1.8 Did the auditor ask for bribes or other benefits?

审核员有没有索要贿赂或其它利益？

6.7.3.1.9 Did factory offer any bribes or other benefits to auditor?

工厂有没有向工厂提供任何贿赂或其它利益？

6.7.3.2 At the end of the phone call audit, the phone call auditor should show appreciation for factory's cooperation during the phone call audit, restate LVG's integrity policy to the factory, and make sure that the factory is aware of LVG's complaint channels;

电话审核结束时，电话审核员应对电话审核中工厂的合作表示感谢，并将 LVG 的廉正政策重新声明，并确保工厂了解 LVG 的投诉渠道；

6.7.3.3 The phone call auditor should note down the factory's responses and complete the records in Random Telephone Audit Report;

电话审核员应记下工厂的回复，并填写随机电话审核报告中的记录；

6.7.4 When there is an integrity issue reported during the phone call audit, the phone call auditor should immediately inform the Operation Manager, Integrity Officer and initiate an investigation;

在电话审核过程中发现廉正问题时，电话审核员应立即通知运营经理，廉正官并展开调查；

6.7.5 The phone call audit records are to be maintained and filling for at least 3 years;

电话审核记录应存档保存至少 3 年；

6.7.6 Integrity Officer is to review and monitored the records Random Telephone Audit Report monthly. If there is integrity issue, s/he is to report to General Manager;

廉正官应每月审查和监控记录随机电话审核报告。如果存在廉正问题，他/她将向总经理报告；

6.8 “Mystery” Audit “神秘” 审核

6.8.1 Plan and Conduct MVs 计划与实施“神秘” 审核

6.8.1.1 LVG client facing teams need to communicate to clients, LVG’s integrity policy and programs, including purpose, process and reporting of Non-compliance(s) of MVs, to get clients’ understanding and support;

LVG 团队需要与客户沟通，LVG 的廉正政策和计划，包括“神秘”审核的不合规的目的，流程和报告，以获得客户的理解和支持；

6.8.1.2 Integrity Officer is to define MV strategies, and adjust the strategies (focus on certain clients, vendors, factories, define frequencies of MVs) as required, by considering integrity issues reported through phone call audits, clients’ complaints and / or requests, and General Manager’s instructions. Integrity Officer is responsible to plan and identify factories for MVs, and assign to Operation Manager or who will then be responsible to schedule these MVs;

廉正官将通过考虑电话审核，客户投诉和/或请求的廉正问题来定义“神秘”审核策略，并根据需要调整策略（专注于某些客户，供应商，工厂，定义“神秘”审核的频率）和总经理的指示。廉正官负责规划和识别“神秘”审核的工厂，并分配给运营经理或负责安排这些“神秘”审核的人员；

6.8.1.3 Integrity Officer in coordination with the Operation Manager can nominate reliable senior auditors as mystery auditors, thereby extending the scope of coverage of the factories through MVs. The Integrity Officer is to formally train the nominated auditors on the MV procedure and qualify them;

廉正官与运营经理协调，可以提名可靠的高级审核员作为神秘审核员，从而通过“神秘”审核扩大工厂的覆盖范围。廉正官将对“神秘”审核程序的指定审核员进行正式培训并对其进行鉴定；

6.8.1.4 Integrity Officer is also to perform the MV. Integrity Officer is to inform the Operation Manager that the s/he will work in the area for a certain period of time. Once they select an inspection job, operation department cannot reject them. The Operation Manager and scheduler should inform the Integrity Officer when there is any change to the audit schedule;

廉正官也要执行“神秘”审核。廉正官应通知运营经理他/她将在该地区工作一段时间。一旦他们选择了一个检查项目，运营部门就不能拒绝他们。当审核时间表发生变化时，运营经理和排单员应通知廉正官；

6.8.1.5 Operation Manager is to conduct at least a MV a quarter. The Operation Manager is to notify Integrity Officer of the MVs scheduled by email;

运营经理每季度至少进行一次“神秘”审核。运营经理将通过电子邮件通知廉正官“神秘”审核排期；

6.8.1.6 The MVs should be arranged with following considerations:

应按以下考虑安排“神秘”审核：

6.8.1.6.1 Focus on, but not limited to those clients, vendors, factories as listed in MV strategy;

关注但不限于“神秘”审核策略中列出的那些客户，供应商，工厂；

6.8.1.6.2 Include newly added factories as much as possible;

尽可能包括新增工厂；

6.8.1.6.3 Historically high suspicious factories by reviewing Random Telephone Audit Report, customer complaints, etc.;

历史上可疑的工厂通过审查随机电话审核报告，客户投诉等，；

6.8.1.6.4 Types of services / jobs that fit the qualifications of MV staff;

符合“神秘”审核员工资格的服务/工作类型；

6.8.1.6.5 Workable factory locations;

可工作的工厂位置；

6.8.1.6.6 Ensure that MV are unknown to factory;

确保工厂不知道“神秘”审核

6.8.1.7 The assigned MV auditors are to obtain relevant documents for the audit jobs as per normal audit working procedure;

指定的“神秘”审核审核员应按照正常的审核工作程序获取审核工作的相关文件；

6.8.2 Conduct MVs and Report Integrity Issues 进行“神秘”和报告廉正性问题

6.8.2.1 MV auditor is to follow normal SOPs, including: hand over Impartiality / integrity declaration and confidentiality commitment to factory's representative, have it signed by factory's representative, not accept factory transportation unless it is absolutely required during unavoidable circumstances. The MV auditor is allowed to accept if they are offered money and gifts and they should get back to office, in order for it to be recorded as an evidence of factory's attempted bribery and report the case to the relevant client;

“神秘”审核审核员应遵循正常的 SOP，包括：将公正性/廉正声明及保密承诺交给工厂代表，由工厂代表签字，不接受工厂接送，除非在不可避免的情况下需要。“神秘”审核审核员如果获得金钱和礼物并报告办公室，则可以接受，以便将其记录为工厂试图贿赂的证据，并将案件报告给相关客户；

6.8.2.2 As an exception, MV auditor (nominated from the operations team) shall accept the offered money / gifts only in case they feel safe / comfortable. In case they are not comfortable to accept, they shall gather as much detail / evidence as possible to prove the factory's attempt to favour them;

作为例外，“神秘”审核审核员（由运营团队提名）只有在感到安全/舒适的情况下才能接受所提供的金钱/礼品。如果他们不愿意接受，他们应尽可能多地收集详细资料/证据，以证明工厂试图贿赂他们；

- 6.8.2.3** When there is any factory's attempt to offer benefit, MV auditor is to accept the offered benefits, but must provide all the findings in the audit, so that it would not lead to any issue while reporting to the client or returning the money to the factory;

当任何工厂尝试提供福利时，“神秘”审核员应接受所提供的福利，但必须在审核中提供所有结果，以便在向客户报告或退还款项时不会导致任何问题 到工厂；

- 6.8.2.4** If mystery auditor is offered bribe when accompanied by normal inspectors, they should try to take a picture of the bribe if the situation is safe, and then refuse the bribe. If the contents are sealed, they should enquire on the contents of offer being made. Their visit shall also be logged as a MV;

如果神秘审计员在正常检查员的陪同下获得贿赂，如果情况安全，他们应该尝试拍照贿赂情况，然后拒绝贿赂。如果内容是密封的，他们应该询问所提供的內容。他们的访问也应记录为“神秘”审核；

- 6.8.2.5** When there is no issue found during mystery, MV auditor is to complete the audit report as per normal procedure.

如果在神秘审核期间没有发现问题，“神秘”审核审核员应按照正常程序完成审核报告。

6.8.3 Report Integrity Issues Discovered through MVs to the Factory, Vendor and/or Client

通过神秘审核向工厂，供应商和/或客户报告发现的廉正问题

- 6.8.3.1** ISC Committee is to assign an Integrity Officer to review overall of integrity issue, photos of bribery money and gifts, and then take further action as listed below:

ISC 委员会将指派一名廉正官对整体廉正问题，贿赂金钱和礼品照片进行审查，然后采取进一步行动，如下所示：

- 6.8.3.1.1** Conduct a phone call interview to the representative and / or management of the factory / vendor / client that offered the bribe, complete phone call audit record, according to Random Telephone Audit Report;

根据随机电话审核报告，对提供贿赂，完整电话审核记录的工厂/供应商/客户的代表和/或管理人员进行电话访问；

- 6.8.3.1.2** If the offering party admits the offer of bribe, the Integrity Officer should request the concerned party to explain its intention and then reiterate LVG's integrity policy, explain that they should never offer benefits to LVG employees, and request the party to provide its bank account or other remittance information in order to return the benefits offered;

如果提供方承认提供贿赂，廉正官应要求有关方解释其意图，然后重申 LVG 的廉正政策，解释他们不应向 LVG 员工提供福利，并要求当事人提供其银行账户或其他汇款信息，以便退还所提供的福利；

6.8.3.1.3 If the party involved denies the allegation, the Integrity Officer without stressing further should just re-iterate LVG's integrity policy and make sure that the party understands the policy;

如果所涉及的一方否认指控，廉正官无需进一步强调，只需重复 LVG 的廉正政策，并确保该方理解该政策；

6.8.3.1.4 Release a formal mail to the factory detailing the incident and re-iterate the LVG integrity policy;

向工厂发布正式邮件，详细说明事件并重新制定 LVG 廉正政策；

6.8.3.1.5 Inform HR Department of the factory's response and the method to return bribery money and/or gifts;

告知人事部工厂的回复以及返还贿赂金钱和/或礼品的的方法；

6.8.3.1.6 Report the integrity issues immediately to General Manager;

立即向总经理报告廉正问题；

6.8.3.2 Integrity Officer is to complete the Integrity Incident Notification Report after validation, attach relevant evidences including photo of envelope, money or gift, and release it to the relevant client within 1 business day from the date of the incident. The report is to be released to the client with cc to the General Manager, CS Manager, Marketing Director, Operation Manager.

廉正官应在验证后填写廉正事件通知报告，附上相关证据，包括信封，金钱或礼品照片，并在事件发生之日起 1 个工作日内将其发布给相关客户。该报告将通过 cc 发送给客户，总经理，CS 经理，营销总监，运营经理。

6.9 Complaint and Investigation Procedure 投诉和调查程序

6.9.1 Receive Integrity Complaints 接受廉正投诉

6.9.1.1 Upon receiving any integrity complaint. operation team, CS team, HR, and all operations functions are to immediately (same time / day) escalate it to their direct supervisor and to the Integrity Officer;

收到任何廉正投诉后。运营团队，CS 团队，人力资源和所有运营职能部门应立即（同一时间/每天）将其报告给直接主管和廉正官；

6.9.1.2 Upon receiving a complaint, Integrity Officer is to review the business line the complaint refers to and then evaluate the need for the involvement of integrity team to initiate the investigation;

廉正官收到投诉后，应审查投诉所涉及的业务线，然后评估廉正团队参与启动调查的必要性；

6.9.1.3 All the above steps should be carried out within 1 business day of receiving the complaint;

上述所有步骤均应在收到投诉后的 1 个工作日内进行；

6.9.1.4 To the extent the complaint lacks sufficient information to initiate an investigation, the Integrity Officer is to attempt to contact the relevant party to obtain further information to support an investigation within 2 business days of receiving the complaint;

如果投诉缺乏足够的信息来启动调查, 廉正官应在收到投诉后的 2 个工作日内尝试联系相关方以获取进一步的信息以支持调查;

6.9.1.5 Based on the available information – including the responses to any follow-up requests for information, if the Integrity Officer feels that the complaint lacks sufficient information to initiate an investigation or the anonymous party does not provide further information as requested, the Integrity Officer is to brief the General Manager and will not start the investigation. If all the relevant information is available, the Integrity Office is to initiate the investigation;

根据现有信息 - 包括对任何后续信息请求的回复, 如果廉正官认为投诉缺乏足够的信息来启动调查, 或者匿名方未按要求提供进一步的信息, 则廉正官将向总经理作简报, 不会开始调查。如果所有相关信息都可用, 廉正官将启动调查;

6.9.2 Notify Client 通知客户

6.9.2.1 The client is to be notified within 1 business day of the receipt of the integrity complaint;

应在收到廉正投诉后的 1 个工作日内通知客户;

6.9.2.2 Operation Manager and Marketing Manager are to coordinate to communicate of the receipt of the integrity complaint to these clients via e-mail;

运营经理和营销总监应协调通过电子邮件向这些客户传达收到廉正投诉的信息;

6.9.3 Conduct Investigation 进行调查

6.9.3.1 The Integrity Officer to prepare the investigation plan within 1 business day from receiving the complaint and decided to conduct investigation. The scope and depth of the investigation is to be outlined in the investigation plan and is to include investigation activities which can comprise but not limited to the following:

诚信官在收到合规后的 1 个工作日内准备调查计划并决定进行调查。调查的范围和深度将在调查计划中列出, 并包括调查活动, 包括但不限于以下内容:

6.9.3.1.1 Review audit reports / contractual agreements and other supporting documents;

审查审核报告/合同协议和其他证明文件;

6.9.3.1.2 Review previous integrity investigation records for any links;

审查任何相关的先前廉正调查记录;

6.9.3.1.3 Review integrity history of alleged person(s) or department or outside company;

审查被指控人员或部门或公司外部的廉正历史;

6.9.3.1.4 Interview representatives related to the complaint and review the information to obtain any evidence;

采访与投诉有关的代表并审查信息以获取任何证据;

6.9.3.1.5 Interview the alleged persons;

与被指控的人面谈;

6.9.3.1.6 Prepare Integrity Investigation Report based on the Non-compliance(s);

根据不合规情况准备廉正调查报告;

6.9.3.2 Only Integrity Officer can handle the integrity related investigations;

只有廉正官才能处理与廉正相关的调查;

6.9.3.3 If the reasons for other department staff's support are justified, the Integrity Officer is to formally request the staff's department manager or above to support in the investigations. The relevant department manager or above should extend full support in the investigations as necessary. The Integrity Officer is to then provide guidance / directions to the staff on the relevant part of the investigation. The nominated staff should not decide on the next course of action without prior approval from Integrity Officer or above;

如果其他部门工作人员的支持理由合理, 廉正官应正式要求工作人员的部门经理或以上人员支持调查。 有关部门经理或以上人员应在必要时全力支持调查。 廉正官随后将就调查的相关部分向工作人员提供指导/指示。 未经廉正官或以上事先批准, 被提名的工作人员不应决定下一步行动;

6.9.3.4 For instances, where staff from other department voluntarily wish to provide their proposals / suggestions related to the investigations, they should approach the Integrity Officer only;

如果其他部门的工作人员自愿希望提供与调查有关的建议/建议, 则应仅向廉正官沟通;

6.9.3.5 Integrity Officer should try to complete the investigations within 15 working days from the date of complaint receipt and release to General Manager within 18 working days;

廉正官应在收到投诉之日起 15 个工作日内尽快完成调查, 并在 18 个工作日内发布给总经理;

6.9.3.6 For any delays in the investigation, Integrity Officer is to justify the reasons and take an approval from the General Manager to extend the timeline;

对于调查的任何延误, 廉正官应证明理由, 并经总经理批准延长时间表;

6.9.3.7 General Manager is to review the investigation report.

总经理应审查调查报告。

6.9.4 Follow-up Action 后续行动

6.9.4.1 After the General Manager, Integrity Officer is to communicate the results of the investigation to the LVG client management team, Operations Manager, location management including HR;

总经理之后, 廉正官将把调查结果告知 LVG 客户管理团队, 运营经理, 人事部;

6.9.4.2 In case the allegation is substantiated or partially substantiated, Integrity Officer is to propose to the relevant department management to analyze the root cause of the issue / complaint and plan the relevant corrective / preventive actions;

如果指控得到证实或部分证实，廉正官应建议相关部门管理层分析问题/投诉的根本原因并制定相关的纠正/预防措施;

6.9.4.3 The analysis and actions are to be updated in the investigation report within 3 business days from the date of proposal by the Integrity Officer;

分析和行动应在廉正官提出之日起 3 个工作日内在调查报告中更新;

6.9.4.4 Upon receiving the action plans from the relevant department, Integrity Officer is to review / verify its effectiveness and then propose for approval to close the case to the General Manager. The verification should be completed within 3 days from its receipt;

廉正官在收到相关部门的行动计划后，应审查/核实其有效性，然后提议批准将案件结案给总经理。验证应在收到后 3 天内完成;

6.9.4.5 If there is a need to share the investigation report with the Client / other external stakeholders, the General Manager is to formally approve the same and advise whether to release it through integrity department or LVG Client management team. Based on the results of the investigation, location management will work with HR to initiate the relevant actions;

如果需要与客户/其他外部利益相关者共享调查报告，总经理将正式批准调查报告，并建议是否通过廉正部门或 LVG 客户管理团队发布。根据调查结果，地方管理部门将与人事部合作，启动相关行动;

6.9.4.6 All investigation reports and supporting documents should be retained for a minimum period of 3 years from the date of Initiation of the investigation;

所有调查报告和证明文件应自调查开始之日起至少保留 3 年;

6.10 Complaint Channels 投诉渠道

6.10.1 The LVG compliant channel includes the hotline and mailbox, which are provided to all clients, vendors, factories, agencies, LVG internal staff and other stakeholders;

符合 LVG 标准的渠道包括热线和邮箱，提供给所有客户，供应商，工厂，代理商，LVG 内部员工和其他利益相关者;

6.10.2 This information is made available through day to day communication / meetings with clients / vendors / factories / seminars / training & factory visits, etc.;

通过与客户/供应商/工厂/研讨会/培训和工厂参观等的日常沟通/会议，可获得此信息;

6.10.3 This information on integrity complaint channels is written on Integrity Code of Engagement Declaration, which is explained to, and signed by factories at the beginning of each audit.

关于廉正投诉渠道的信息写在廉正保密公正声明中，该声明在每次审核开始时由工厂解释并签字。

7.0 Forms/Records 表格/记录

- 7.1 Impartiality/Integrity declaration and confidentiality commitment 公正性/廉正声明及保密承诺
- 7.2 Random Telephone Audit Report 随机电话审核报告
- 7.3 Integrity Investigation Report 廉正调查报告
- 7.4 Mystery Audit Report 神秘审核报告
- 7.5 Integrity Incident Notification Report 廉正事件通知报告





Integrity Procedure

廉正程序

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Document Revision Records

No.	Date	Description of Change	Prepared By	Reviewed By	Approved By
1.0	August 1 2019	Initial Release	Yuki TSE 	Yuki TSE 	Aron QU 