

## ILS Social Compliance Audit

<b>Audit Reference #:</b> (audit firm internal)	10211171289	<b>Audit ID #:</b> (Disney's ID)	N/A
<b>Date Audit Started:</b> Year/Mo/Day	2021/05/12	<b>Date Audit Completed:</b> Year/Mo/Day	2021/05/12
<b>Code Conducted to:</b>	Disney	<b>Audit Report Date:</b> Year/Mo/Day	2021/05/19
<b>Audit Type:</b>	Initial Audit	<b>Special Program:</b> (only required if applicable to NDAs)	None

### Facility Information

<b>Facility ID No.:</b>	N/A		
<b>Facility Name:</b>	Ningbo Zhenhai Chengdi Stationery Co., Ltd.		
<b>Address Line 1:</b>	4th Building, No.728 West Zhenluo Road, Luotuo Street		
<b>Address Line 2:</b>	Zhenhai District		
<b>City:</b>	Ningbo	<b>State/Province:</b>	Zhejiang
<b>Town:</b>		<b>Country:</b>	China
<b>Zip Code:</b>	315000	<b>GPS Location:</b>	N/A
<b>Contact Name:</b> (First and Last)	Xiaomei Xu	<b>Contact Person Title:</b>	HR Manager
<b>Primary Email:</b>	2853376002@qq.com	<b>Phone Number:</b> Country code – area code / phone number	86-574- 86559909
<b>Contact Person Title:</b>	HR Manager	<b>Fax:</b> Country code – area code / phone number	86-574- 86587331

## Name/Address/Ownership Updates

<b>Facility Name:</b>	
<b>Facility Address:</b>	
<b>Facility Ownership Update:</b>	
<b>Upcoming Relocation or Expansion:</b>	

## Audit Team

<b>Audit Firm:</b>	BVCPS
<b>Number of Auditors:</b>	2

	<b>Name</b>	<b>APSCA Registration Number</b>	<b>APSCA Certification Number</b>
<b>Audit Team Member 1: (Lead/Exclusive Auditor)</b>	Nimo Jia	21701178	
<b>Audit Team Member 2:</b>	Leonardo Li	21704627	
<b>Audit Team Member 3:</b>			
<b>Audit Team Member 4:</b>			
<b>Audit Team Member 5:</b>			
<b>Audit Team Member 6:</b>			
<b>Audit Team Member 7:</b>			
<b>Audit Team Member 8:</b>			

*(Note: In FANS, please input auditor(s)' APSCA Registration Number(s) in the Cross-Reference Tab of the DDM – 1 row for each auditor)*

## Audit Details & Assessment

### Facility Details

<b>Access to Facility:</b>	Accepted		
<b>Access to Facility - Predetermined Comments</b>	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Auditors attempted to conduct an audit and were denied access. <input type="checkbox"/> Other		
<b>Access to Facility - Additional Comments:</b>	Nil		
<b>Current % Capacity Devoted to Disney:</b>	1%	<b>Past % Capacity Devoted to Disney:</b>	8%
<b>Products Produced:</b>	Pencil case, stationery set, notebook (such as softcover notebook, plush notebook and etc.)		
<b>Disney Products Observed:</b>	Notebook with Mickey mouse		
<b>Production Processes:</b>	Printing, cutting, coating, indentation, assembly, inspection and packing		
<b># Total Employees:</b>	166	<b>#Production Employees:</b>	131
<b># Buildings:</b>	1		
<b># Buildings by Purpose:</b>	1/warehouse, office, printing, cutting, coating, indentation, assembly, inspection and packing		
<b>Peak Production Months:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input checked="" type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input type="checkbox"/> December <input type="checkbox"/> March <input type="checkbox"/> August		
<b>Low Production Months:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input checked="" type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input type="checkbox"/> December <input type="checkbox"/> March <input type="checkbox"/> August		

<b>Facility Regular Hours:</b>	8	<b>Facility # of Shifts/Hours</b>	All: 1/08:00-12:00, 13:00-17:00
<b>Other Brands Present?</b>	Primark, Undercover		
<b>Establishment Date: Yr/Mo/Day</b>	2006/02/14		

<b>Nationality of Management:</b>	Chinese
<b>Nationality of owner/owner entity:</b>	Chinese

**Management Gender (enter # of people):**

	Male	Female
Managers	8	22
Supervisors	3	2

<b>Nationality of Workers:</b> (Top 5 Countries)	<b>Approx. % of Total Workforce:</b>
Chinese	100%
<b>List ALL other nationalities in the facility:</b>	N/A

*(Note: If there are North Korean workers in the facility, please additionally provide the following details in the Comments section of the Audit Report:*

- *Employment dates of each North Korean worker*
- *Labor agent of each North Korean worker*
- *Type of work authorization/permission for each North Korean worker*
- *Summary of Code category violation related to the North Korean workers (detailed info of the Code category violation related to the North Korean workers shall be reported as per the standard reporting process)*

## Audit Details

<b>Attendance Records Tested:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> None <input type="checkbox"/> January <input type="checkbox"/> February <input checked="" type="checkbox"/> March	<input type="checkbox"/> April <input checked="" type="checkbox"/> May <input type="checkbox"/> June <input type="checkbox"/> July <input type="checkbox"/> August	<input type="checkbox"/> September <input checked="" type="checkbox"/> October <input type="checkbox"/> November <input type="checkbox"/> December
<b>Payroll Ledgers Tested:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> None <input type="checkbox"/> January <input type="checkbox"/> February <input checked="" type="checkbox"/> March	<input type="checkbox"/> April <input checked="" type="checkbox"/> May <input type="checkbox"/> June <input type="checkbox"/> July <input type="checkbox"/> August	<input type="checkbox"/> September <input checked="" type="checkbox"/> October <input type="checkbox"/> November <input type="checkbox"/> December
<b>Last Pay Date:</b> Year/Mo/Day	2021/04/30	<b>Number of Records Sampled:</b>	20
<b># Individual Employee Interviews:</b>	12 (10 sampled employees and 1 new hire employee and 1 youngest employee)	<b># Employee Group Interviews:</b>	0
<b>Numbers per Group:</b>			
<b>Additional Locations Audited?</b>	No		
<b>Explain Additional Location Details:</b>	Nil		
<b>Comments/Observations:</b>	Nil		
<b>Communicated Findings With:</b>	Ms. Xu Xiaomei/HR Manager		
<b>Agreed to and Signed CAPAR?</b>	Yes		
<b>Audit Entered by:</b> (Name)	Christine Zhao		

## Comments Details

<b>Comments:</b>
<b>Name and Title of Others Present (ex. translators, observers, trainees):</b> Kiki Kuai (on-site Trainee)
<b>Attendance Records Provided:</b> 13/April 2020 to April 2021
<b>Payroll Records Provided:</b> 12/April 2020 to March 2021
<b># of Records Sampled (description):</b> Current: 10, Random: 5, Random: 5
<b>Resources Received from Facility (i.e. transportation, meals):</b> Factory provided lunch in the office and the auditors paid RMB 15/person as lunch fee, transportation from factory to Ningbo railway station and the auditors paid RMB 70 to the manager.
<b>Factory Representative in opening meeting (name/title):</b> Ms. Xu Xiaomei, HR Manager, Ms. Zhu Yan, worker representative.
<b>Factory Representative in closing meeting (name/title):</b> Ms. Xu Xiaomei, HR Manager, Ms. Zhu Yan, worker representative.
<b>Name of Vendor/License:</b> Ningbo Zhenhai Chengdi Stationery Co., Ltd.

## **Audit Violations**

<u>Age Requirement</u>	<p><b>Child Labor:</b> <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable</p> <p><b>Law / Code:</b> Additional Comments: No apparent violations</p> <p><i>Remarks:</i> 1. Local minimum age standard: 16 years old 2. Minimum age of the factory's employees: 20 years old</p> <p><b>Other:</b> <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable</p> <p><b>Law / Code:</b> Additional Comments: No apparent violations</p> <p><b>Young Persons:</b> <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable</p> <p><b>Law / Code:</b> Additional Comments: No apparent violations</p>
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<p><b><u>Association:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>
<p><b><u>Coercion and Harassment:</u></b></p>	<p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Physical Abuse or Sexual Harassment:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>



<p><b>Compensation:</b></p>	<p><b>Minimum Wage:</b></p> <p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i></p> <p><input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:</p> <p>Additional Comments: No apparent violations.</p> <p><i>Remarks:</i></p> <p>Local minimum wage standard: (wage per hour or per month): RMB2010 per month or RMB11.55 per hour since December 1, 2017.</p> <p>Minimum wage paid by factory to workers: According to 20 sample population employees' payroll and attendance records (10 samples from current paid month March 2021, 5 samples from October 2020 and 5 samples from May 2020) provided by the factory, all sample population were paid at least RMB11.55 per hour as regular wage.</p> <p><b>Overtime Hours:</b></p> <p><input type="checkbox"/> Acceptable   <input checked="" type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i></p> <p><input checked="" type="checkbox"/> Employees work in excess of 60 hours per week for more than 17 weeks per year.</p> <p>Disney Code of Conduct: We expect manufacturers to recognize that wages are essential to meeting employees' basic needs. Manufacturers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits. Except in extraordinary business circumstances, manufacturers will not require employees to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by local law or, where local law does not limit the hours of work, the regular work week plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period.</p> <p>Additional Comments: A review of 5 sample employees' time records from May 12, 2020 to May 11, 2021, auditors noted that 5 out of 5 sample employees worked in excess of 60 hours (i.e. 63 to 71 hours) for 46 weeks during that period which exceeded the client's standard of maximum 17 weeks in a year.</p> <p><input checked="" type="checkbox"/> Employees work in excess of six consecutive days without a day of rest.</p> <p>Law / Code: Article 38 of the Labor Law of the PRC, employing units are to guarantee that employees have at least one day off a week.</p> <p>Disney Code of Conduct: We expect manufacturers to recognize that wages are essential to meeting employees' basic needs. Manufacturers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits. Except in extraordinary business circumstances, manufacturers will not require employees to</p>
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work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by local law or, where local law does not limit the hours of work, the regular work week plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period.

Additional Comments: Auditors noted that 25 out of 25 sample population employees worked seven days consecutively without rest.

A review of the sample population employees' time records (5 samples from May 2020, 5 samples from October 2020, 10 samples from March 2021 and 5 samples from April 2021) yielded the following:

- (1) 5 out of 5 sample population employees worked 30 days consecutively without rest in May 2020, which was not in compliance with the client's standard;
- (2) 5 out of 5 sample population employees worked 27 days consecutively without rest in October 2020, which was not in compliance with the client's standard;
- (3) 10 out of 10 sample population employees worked 31 days consecutively without rest in March 2021, which was not in compliance with the client's standard;
- (4) 5 out of 5 sample population employees worked 26 days consecutively without rest in April 2021, which was not in compliance with the client's standard.

Employees work in excess of the legal overtime limit.

Law / Code: Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

Additional Comments: A review of 25 sample population employees' time records (5 samples from May 2020, 5 samples from October 2020, 10 samples from March 2021 and 5 samples from April 2021) yielded the following:

- (1) 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 118 hours) in May 2020, which was not in compliance with the legal requirement;
- (2) 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 108 to 112 hours) in October 2020, which was not in compliance with the legal requirement;
- (3) 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 103 to 115 hours) in March 2021, which was not in compliance with the legal requirement;
- (4) 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 100 hours) in April 2021, which was not in compliance with the legal requirement.

*Remarks:*

- 1. Attendance Recorded by: (automated/electronic, timecard, manual, no recording, etc.): finger printing attendance system
- 2. Auditors noted according to provided attendance records, the maximum overtime hours were 3 hours per day and 118 hours per month, maximum weekly working hours were 71 hours and maximum consecutive working days were 31 days.

**Overtime Wage:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

*Law / Code:*

Additional Comments: No apparent violations.

*Remarks:*

Auditors noted according to provided payroll and attendance records that all sampled employees were compensated 150% and 200% of normal wages for overtime on weekdays and rest days respectively, which was in compliance with legal requirement. No overtime in statutory holidays was noted.

**Social Benefits and Other Compensation:**

Acceptable  Needs Improvement  N/A  Unable to Verify

*Predetermined Comments:*

Employees are not provided with legally mandated benefits

*Law / Code:* Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.

The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.

Additional Comments: According to the social insurance payment receipt provided by factory management, auditors noted that only 122 out of 166 employees were provided with pension, unemployment, medical, maternity and accident insurance in March 2021. The factory provided commercial accident insurance to 45 employees with a valid period from August 30, 2020 to August 29, 2021.

*Remarks:*

Regular Pay Date: on or before the 30th of next month

Wage pay in/by (cash, check, direct deposit, etc.): Cash

**Health and Safety:**

**Dormitories:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

N/A

Law / Code:

Additional Comments: The factory did not provide dormitory for workers.

**Fire & Emergency Safety:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

A valid fire acceptance approval document is not available for review or does not include all buildings.

Law / Code: Article 13 of the Construction Project Fire Safety Supervision and Management Regulation, for the following densely-populated places, the construction units shall apply approval for fire safety design from the public security fire control institution and at the completion of the construction project, apply fire control acceptance check from the public security fire control institution: (4) production and process workshop of labor intensive factories with a total construction area of more than 2500 square meters and (5) employee dormitories with a total construction area of more than 1000 square meters of labor intensive factories.

Article 24 of the Construction Project Fire Safety Supervision and Management Regulation (Extract), for the other construction works and construction units not including in Article 13 and 14 shall enter the fire design and inspection in the records within 7 day after the construction was approved to build, or inspection for completed building construction projects. The record shall be put onto website of province fire control bureau, or to the site of local fire control bureau.

Additional Comments: Auditors noted that the Fire Protection Acceptance Check on current production building was not applied by the audited factory directly. Provided document indicated that a fire acceptance check approval on the current production building was issued to Ningbo Huaxin Construction Project Co., Ltd. While the audited factory rented building from this company, they did not go through re-approval process on its own fire control design since it became a new tenant in May 2018.

**Hazardous Material:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Machine & Electrical Safety:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Machines/equipment are not equipped with protective covers or safety devices.

Law / Code: Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.

Additional Comments: Auditors noted that 6 out of 6 sewing machines being used in the workshop were not installed with needle guard. (please see picture #1)

**Medical & First Aid:**

Acceptable  Needs Improvement  N/A  Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Other:**

Acceptable  Needs Improvement  N/A  Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Personal Protective Equipment (PPE):**

Acceptable  Needs Improvement  N/A  Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Sanitation:**

Acceptable  Needs Improvement  N/A  Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations


<p><b><u>Involuntary Labor:</u></b></p>	<p><b>Mandatory Overtime:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Prison, Bonded, Indentured, Forced Labor:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>
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<p><b><u>Monitoring and Compliance:</u></b></p>	<p><b>Ethics:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Insufficient or Inadequate Records:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Transparency:</b>  <input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>
<p><b><u>Non-Discrimination:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable    <input type="checkbox"/> Needs Improvement    <input type="checkbox"/> N/A    <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>

<p><b><u>Other Laws (if applicable):</u></b></p>	<p><b>Labor Contract:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations</p>
<p><b><u>Protection of the Environment:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Publication:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Subcontracting:</u></b></p>	<p><input type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input checked="" type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> N/A</p> <p>Law / Code:  Additional Comments: Auditors confirmed that Ningbo Zhenhai Chengdi Stationery Co., Ltd. did not subcontract or receive Disney-branded production from any facility or other sources during May 2020 to May 2021.</p>



**Appendix:**

<b>1</b>	<b>N/A</b>	<b>N/A</b>
 A photograph showing a person from the side, wearing a white shirt, operating a sewing machine. They are working on a piece of light blue fabric. The sewing machine is white and black. A date stamp '2021/05/12' is visible in the bottom right corner of the photo. 2021/05/12		