

## **Closure Validated Audit Report**

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Audit Reference Number		VAR-20220719-CN-02B02	VAR-20220719-CN-02B02-1			
Audited Facility		HongHengSheng	HongHengSheng			
Audit Date		07/19/2022				
Overall Audit Score		174.2				
Disclaimer RE inc		number herein is not in any RBA is not liable for any lo incidental, punitive, direct,	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.			
F	Audit Informa	ation	1	Fa	acility Information	
Audit ID	G-AU-100	008773		Company Name	Zhen Ding Technology Holding Ltd.	
Audit Reference Number	VAR-2022	20719-CN-02B02-1		Facility Name	HongHengSheng	
QC Completed Date	07/28/202	22	'n.	RBA Facility ID	G-FA-10001716	
Audit Start Date	07/19/2022		7.5	Facility Address	No.168, Fushikang Road, Huai'an	
Closing Meeting Date	07/19/2022				Economic and Technological Development Zone, Jiangsu Province,	
Audit Type	Closure A	Closure Audit			China 223005 (Inside of Integrated Free	
Audit Firm	BSI	BSI			Trade Zone)	
Audit Category	VAP	P		Facility Country	China	
VAP Version	RBA Prot	Protocol 7.0.1 - September 2021		Facility Point Of Contact	xing-bing.zhou@avaryholding.com	
Auditor	Auditor-19	93		Total Number Of Workers	1949	
A) Labor	A) Labor					
FREELY CHOSEN EMPLOYN	MENT					
Question # VAP-A		AP-A1.1				
		ny type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave bor is not permitted.				
Rating Conform		nformance				
Conclusion Any type of forced, involuntary or labor is not permitted. No foreign		xploita nigrant	tive prison, indentured, bonded workers are used by the facility	(including debt bondage), trafficked or slave		
Question # VAP-A1.2		VAP-A1.2				
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Question Text

Rating Conclusion Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.

Adequate and effective procedures are established ensuring that any form of forced, bonded (including debt

bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.



Audit Reference Number VAR-20210913-CN-01A01-12		
Audited Facility	HongQiSheng Precision Electronics(Qinhuangdao) Co., Ltd.	
Audit Date	09/13/2021	
Overall Audit Score	170.4	
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.	

Audit Information		
Audit ID	G-AU-10006699	
Audit Reference Number	VAR-20210913-CN-01A01-12	
QC Completed Date	09/29/2021	
Audit Start Date	09/13/2021	
Closing Meeting Date	09/17/2021	
Audit Type	Initial Audit	
Audit Firm	UL Responsible Sourcing	
Audit Category	VAP	
Auditor	Lynnee Liu lynnee.liu@ul.com	
	Lingxiao Sophia Xu sophia.xu@ul.com	

Facility Information		
Co	ompany Name	Zhen Ding Technology Holding Ltd.
Facility Name		HongQiSheng Precision Electronics(Qinhuangdao) Co., Ltd.
RE	BA Facility ID	G-FA-10001717
Fa	acility Address	No. 18, Tengfei Road, Economic and Technological Development Zone,
Fa	acility Country	China
Fa	acility Point Of Contact	hai-xin.wang@avaryholding.com
То	otal Number Of Workers	9288

	sopriia.xu@ui.com	
A) Labor		
FREELY CHOSEN EMPLOY	MENT	
Question #	VAP-A1.1	
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.	
Rating	Conformance	
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.	
Question #	VAP-A1.2	
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.	
Rating	Conformance	
Conclusion	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including	



# **Closure Validated Audit Report**

Audit Reference Number	VAR-20211227-CN-04B02-4	
Audited Facility	Avary Holding (ShenZhen) Co.,Ltd.	
Audit Date	12/27/2021	
Overall Audit Score	187.1	
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.	

Audit Information		
Audit ID	G-AU-10007607	
Audit Reference Number	VAR-20211227-CN-04B02-4	
QC Completed Date	01/15/2022	
Audit Start Date	12/27/2021	
Closing Meeting Date	12/27/2021	
Audit Type	Closure Audit	
Audit Firm	SGS	
Audit Category	VAP	
Auditor	Auditor-604	

d	Faci	lity Information	
	Company Name	Zhen Ding Technology Holding Ltd.	
١,	Facility Name	Avary Holding (ShenZhen) Co.,Ltd.	
	RBA Facility ID	G-FA-10001718	
	Facility Address	Songluo Road, Yanchuan Community, Yanluo Street, Bao'an District, Shenzhen, Guangdong	
	Facility Country	China	
	Facility Point Of Contact	ady.q.sun@avaryholding.com	
	Total Number Of Workers	9948	

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A) Labor			
FREELY CHOSEN EMPLOYM	FREELY CHOSEN EMPLOYMENT		
Question # VAP-A1.1			
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.		
Rating Conformance			
Question #	VAP-A1.2		
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.		
Rating	Conformance		
Conclusion	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including		



Audit Reference Number	VAR-20220704-CN-02A01-7	
Audited Facility	QingDing	
Audit Date	07/04/2022	
Overall Audit Score	160.9	
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.	

Audit Information		
Audit ID	G-AU-10008449	
Audit Reference Number	VAR-20220704-CN-02A01-7	
QC Completed Date	07/21/2022	
Audit Start Date	07/04/2022	
Closing Meeting Date	07/08/2022	
Audit Type	Initial Audit	
Audit Firm	Greenment	
Audit Category	VAP	
VAP Version	RBA Protocol 7.0.1 - September 2021	
Auditor	Auditor-798 Auditor-795 Auditor-797	

	Facility Information			
	Company Name	Zhen Ding Technology Holding Ltd.		
`\	Facility Name	QingDing		
	RBA Facility ID	G-FA-10001720		
Ş	Facility Address	8, Pengding Road, Huai'an Economic and Technological Development Zone		
1	Facility Country	China		
	Facility Point Of Contact	shuang-shuang.meng@avaryholding.com		
	Total Number Of Workers	6463		

	Pladio 757
A) Labor	
FREELY CHOSEN EMPLO	YMENT
Question #	VAP-A1.1
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.
Rating	Minor Non-Conformance
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted. However, prohibited recruitment and hiring fees that are paid and reimbursed within 90 days after commencement of employment. RMB 45, which is about 1% of basic monthly wages and less than 5% (<1-month gross base salary), is paid by 81 out of 81 (100%) workers for the pre-employment medical test in cash to hospital, and returned to all workers in a month (within 90 days after commencement of employment).
Question #	VAP-A1.2
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.
Rating	Conformance
Conclusion	Adequate and effective procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.



Audit Reference Number	VAR-20230911-CN-02A01-3
Audited Facility	HongQiSheng Precision Electronics(Qinhuangdao) Co., Ltd.
Overall Audit Score	178.4/200
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.

Audit Information	
Audit ID	G-AU-10010954
QC Completed Date	10/02/2023
Audit Start Date	09/11/2023
Closing Meeting Date	09/15/2023
Audit Type	Initial Audit
Audit Firm	Intertek
Audit Category	VAP
VAP Version	RBA Protocol 7.1.2 - July 2023
Auditor Information	Auditor-1497, Auditor-1539, Auditor-273

Facility Information	
Company Name	Zhen Ding Technology Holding Ltd.
Facility Name	HongQiSheng Precision Electronics(Qinhuangdao) Co., Ltd.
RBA Facility ID	G-FA-10001717
Facility Address	No. 18, Tengfei Road, Economic and Technological Development Zone, Qinhuangdao, Hebei 066000
Facility Country	China
Facility Point Of Contact	hai-xin.wang@avaryholding.com
Total Number Of Workers	8768

A) LABOR	
A1) FREELY CHOSEN EM	PLOYMENT
Question #	VAP-A1.1
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted
Rating	Conformance
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked, or slave labor is not permitted.
Question #	VAP-A1.2
Question Text	Terms and conditions of employment are provided in writing and in their native language prior to employment (foreign migrant workers: before leaving their home country) and the key terms and conditions of employment are explained verbally in their native language so workers understand what the terms and conditions of employment state.
Rating	Conformance
Conclusion	Terms and conditions of employment are provided in writing and in their native language prior to employment, and the key terms and conditions of employment are explained verbally in their native language, so workers understand what the terms and conditions of employment state. No foreign migrant workers in the facility.



Audit Reference Number	VAR-20230614-CN-05A01-5
Audited Facility	Avary Holding (ShenZhen) Co.,Ltd.
Overall Audit Score	180.6/200
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.

Audit Information	
Audit ID	G-AU-10010306
QC Completed Date	07/02/2023
Audit Start Date	06/14/2023
Closing Meeting Date	06/16/2023
Audit Type	Initial Audit
Audit Firm	TUV-Rheinland
Audit Category	VAP
VAP Version	RBA Protocol 7.0.1 - September 2021
Auditor Information	Auditor-117, Auditor-58, Auditor-46, Auditor-89

Facility Information	
Company Name	Zhen Ding Technology Holding Ltd.
Facility Name	Avary Holding (ShenZhen) Co.,Ltd.
RBA Facility ID	G-FA-10001718
Facility Address	Songluo Road, Yanchuan Community, YanluoStreet, Bao'an District,Shenzhen Shenzhen, Guangdong 518105
Facility Country	China
Facility Point Of Contact	sonia.sh.zhang@avaryholding.com
Total Number Of Workers	5766

A) Labor		
FREELY CHOSEN EMPLOYMENT		
Question #	VAP-A1.1	
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.	
Rating	Conformance	
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted, no foreign migrant worker is used in the facility.	
Question #	VAP-A1.2	
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.	
Rating	Conformance	
Conclusion	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.	