Monitoring summary report for TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED





Monitored Party amfori ID Address

TOAN TAM PHAT PRODUCTION - 704-002120-000 Road No. 6, Ho Nai Industrial

TRADING - SERVICES COMPANY Park, Phase 2, Ho Nai 3

LIMITED Commune, Trang Bom District,

NA, Đồng Nai, Vietnam

Monitoring Activity Monitoring Type Monitoring Partner

amfori Social Audit - Full Monitoring Intertek

Manufacturing

Monitoring Start Date Closing Meeting Finished Date Submission Date 29/04/2025 29/04/2025 15/05/2025

10/05/2020

Expiration Date Announcement Type

15/05/2026 Semi Announced

Site Site amfori ID

BRANCH OF TOAN TAM PHAT 704-002120-001

PRODUCTION - TRADING SERVICES COMPANY LIMITED

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OVERALL RATING



SECTION RATING

PA1: Social Management System	В	
PA 2: Workers Involvement and Protection	С	
PA 3: The Rights of Freedom of Association and Collective Bargaining	Α	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	Α	

PA 6: Decent Working Hours	С	
PA 7: Occupational Health and Safety	D	
PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	Α	

GENERAL DESCRIPTION

Name of lead auditor: Bui Hong Phuong - CSCA 21700470.

Name of team auditor: Pham Phi Oanh – CSCA 21700490; Mai Thi Anh Chu – CSCA 32200707; and Tran Thuy An – ASCA 32200278.

Name of observers, translators, trainees, advisors/consultants (if applicable): Nil

Monitoring partner name: Intertek Vietnam.

Audit schedule details: The allocated man-days for the audit were 4 man-days, including 0.5 man-days for report writing. 04 auditors visited the facility on 29th April, 2025 (providing sufficient man-days allocation as required by BSCI audit procedure).

Announcement Type: Semi-announced audit.

Monitoring Type: Full Monitoring.

Business partner information: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED is located at Road No. 6, Ho Nai Industrial Park, Phase 2, Ho Nai 3 Commune, Trang Bom District, Dong Nai province, Vietnam. The facility has operated under Business license No. 3602374181-001 firstly issued on 14th April 2021 by Department of Planning and Investment of Dong Nai Province, as manufacturer of Indoor furniture.

The main production processes are listed as follows: incoming materials, sawing, drying, preliminary, refining, processing, sanding, assembly, painting, inspection, packing, and storage.

Audited location information: The total land area occupied by the site was 25,00 square meters of land area. In view of the facility consist of 05 buildings as following:

- Building 1 with 03 story was occupied for full production process.
- Building 2 with 01 story was occupied for finished goods warehouse and material warehouse.
- Building 3 with 02 story was occupied for main office and showroom.
- Building 4 with 02 story was occupied for workers' canteen and managers' lunch break area.
- Building 5 with 02 story was occupied for motorbike parking.

There is no employees' dormitory, transportation available for the workers due to no local law requirement. The subbuildings consist of security room, fire pump area, air compressor area, boiler area, chemical storage and others.

Operating shifts and hours: In general, facial recording system are used to monitor working hours. The normal working hours are 8.0 hours per day, 48 hours per week. Sunday was designated the rest day. Administration and production employees work in 01 shift from 07:15 to 16:15, with lunch break from 11:15 - 12:15. Except that the internal security guards working in 3 shifts: shift 1 is from 6:00 to 14:00 with a 30-minute break, shift 2 is from 14:00 to 22:00 with a 30-minute break, and shift 3 is from 22:00 to 6:00 the following day with a 45-minute break. There were short breaks from 9:00-9:10 and 14:00-14:10 for all shifts. Employees worked overtime voluntarily. The peak seasons were December, January and March in the facility. The toilet or water breaks are being implemented, and separately given from lunch breaks.

During the audit, the payroll and time records of 12 months from April 2024 to March 2025 were provided for review. Payroll and time records of 30 samples in March 2025 (current month); 30 samples in December 2024 (peak month); and 30 samples in September 2024 (random month). As per management and workers interviews, the overtime maximum was from 52 hours per month, and 2.0 hours per day. The maximum consecutive working days were 6 days. The weekly working hour and overtime is as below:

March 2025 – standard weekly working hours is 48 + maximum weekly OT is 06 hours. December 2024 – standard weekly working hours is 48 + maximum weekly OT is 12 hours. September 2024 – standard weekly working hours is 48 + maximum weekly OT is 12 hours.

Salary payment details: Monthly-rate was applied for all employees. Salary was paid on 10th of following month for cycle period from 1st to 31st of the month. Salary is paid by cash with pay-slip provided to the employees for reference. Pay slip was provided for employees to retain it. The facility has guaranteed the minimum wage to workers. Payment was made accurately and on-time. Highest and average wage paid per month after legally tax and insurance deduction are estimated

about VND 16,800,000 and VND 8,50,000 respectively. Employees were provided with social, health and unemployment insurance sufficiently as law requirement until March 2025. No illegal wage deduction was found or reported. Since 01 July 2024, the legal minimum wage is VND 4,960,000 per month while the minimum wage applied by facility is VND 5,307,200 after pass probation.

Worker number information: The factory has 623 employees (329 males & 294 females), including 573 production employees and 50 non-production employees working in the facility. On the audit date, 605 employees were presented while 18 workers were absent due to security working for night shift, annual leave and sick leave. The facility uses contractor for canteen service. The youngest workers are 18 years old.

Good practices: the facility has provided some allowances for employees such as: living support provided to all employees: VND 500,000/pax, transportation support provided to all employees: VND 300,000/pax, child care allowance provided to all female employees who have under 06-year old children: VND 500,000/child/pax, seniority support: VND 450,000/pax, and others.

Worker organization details: Trade union was elected at the factory on 25th April 2024 with 07 executive members. Trade Union Chairman was Ms. Nguyen Thi Phuong Ngan. The facility's current valid CBA was established on 15th May 2023. All interviewed employees knew the chairwoman and knew the activities of the trade union. Speak for Change (S4C) has implemented in the factory, S4C poster posted in the workplace area. The interviewed workers were aware of and known fully about the program. During the audit, auditor has communicated, explained and share the information towards the S4C as well as the flyers for their reference.

Circumstances: There was no special circumstance during the audit.

Summary of findings:

PA1 with two findings on 1.1 and 1.5;

PA2 with two findings on 2.2 and 2.5;

PA5 with one finding on 5.4;

PA6 with one finding on 6.2;

PA7 with five findings 7.3, 7.4, 7.9, 7.10, 7.17 and 7.18;

PA13 with one finding on 13.1.

Living wage calculation: #LIVINGWAGE - The basic living wage was calculated based on the GLWC website. All input data were estimated based on the authorized data source of Region IV. Living Wage is estimated following the methodology as below: (1) Estimating cost of a basic but decent living standard for a reference size family, (2) Going from cost of a basic but decent life to a net living wage, (3) Going from net living wage to gross living wage, (4) Determining prevailing wages and whether workers are paid a living wage.

Remark

- 1/ Groups interviews were conducted with 04 groups (1st: 2 males 2 females; 2nd: 2 males 2 females; 3rd: 2 males 2 females; and 4th 2 males 2 females).
- 2/ The documents below were not uploaded in the system due to not applicable: Agency labor contract, Government waivers, Inconsistencies between time and production records.
- 3/ All workers in this facility were hired at least 18 years old, so no young worker/child labor record is applicable 4/ The annual turnover was not provided due to confidential information.
- 5/ 7.23 and 7.24 Not applicable The facility does not provide the transportation. The facility did not provide the dormitory to employees.
- 6/ The number of employees presented on the audit date is 605 out of 623 employees; 18 workers were absent due to security working for night shift, annual leave and sick leave.

SITE DETAILS

Site

Site amfori ID

BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING -SERVICES COMPANY LIMITED 704-002120-001

GICS Classification

Sector Industry Group Industry

Consumer Discretionary Consumer Durables & Apparel Household Durables

Sub Industry

Home Furnishings

amfori Process Classifications	GS1 Classifications
N.A.	N.A.
NACE Classification	Water Stress Situation
N.A.	N.A.

METRICS

Key Metrics

Total workforce	605 Workers
Legal minimum wage in local currency	4.960.000 Monthly
Lowest wage paid for regular work at the site	5.307.200 Monthly
Calculated living wage in local currency	8.970.296 Monthly
Total sample	30 Workers

Other Metrics

Other metrics		
Male workers	315 Wo	orkers
Female workers	290 Wo	orkers
Non-binary workers	0 Wd	orkers
Permanent workers - Male	329 Wo	orkers
Permanent workers - Female	294 Wo	orkers
Permanent workers - Non-binary	0 Wo	orkers
Temporary workers - Male	0 Wo	orkers
Temporary workers - Female	0 Wo	orkers
Temporary workers - Non-binary	0 Wo	orkers
Seasonal workers - Male	0 Wo	orkers
Seasonal workers - Female	0 Wo	orkers
Seasonal workers - Non-binary	0 Wo	orkers
Management - Male	8 Wo	orkers
Management - Female	7 Wo	orkers
Management - Non-binary	0 Wo	orkers
Apprentices - Male	0 Wo	orkers
Apprentices - Female	0 Wo	orkers
Apprentices - Non-binary	0 Wo	orkers
Workers on probation - Male	12 Wo	orkers
Workers on probation - Female	15 Wo	orkers
Workers on probation - Non-binary	0 Wo	orkers
Workers with night shift - Male	8 Wo	orkers
Workers with night shift - Female	0 Wo	orkers
Workers with night shift - Non-binary	0 Wo	orkers
Workers with disabilities - Male	0 Wo	orkers
Workers with disabilities - Female	0 Wo	orkers
Workers with disabilities - Non-binary	0 Wo	orkers
Domestic migrant workers - Male	0 Wo	orkers
Domestic migrant workers - Female	0 Wd	orkers
Domestic migrant workers - Non-binary	0 Wo	orkers
Foreign migrant workers - Male	0 Wd	orkers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	328	Workers
Workers hired directly - Female	291	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	1	Workers
Workers hired indirectly - Female	3	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	329	Workers
Unionised workers - Female	294	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	329	Workers
Workers under CBA - Female	294	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	3	Workers
Workers on parental leave - Male	2	Workers
Workers on parental leave - Female	2	Workers
Workers on parental leave - Non-binary	0	Workers
Minimum wage agreed on CBA in local currency	4.960.000	Monthly
Sample - Male	15	Workers
Sample - Female	15	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site amfori ID: 704-002120-001

Question: 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with amfori BSCI Code of Conduct requirement on Supply Chain Management and Cascade Effect, "For producers that will be monitored, internal management systems are particularly encouraged as an effective way to embed the amfori BSCI Code of Conduct in their business practices."

Based on the document review and confirmation by facility management, the facility has established a social compliance management system to implement the BSCI Code of Conduct. However, there were several non-compliance issues due to insufficient monitoring of social compliance performance. Please refer to findings in relevant performance areas for more details.

Ghi nhận doanh nghiệp đã xây dựng hệ thống quản lý về trách nhiệm xã hội theo tiêu chuẩn BSCI. Tuy nhiên, có một số điểm chưa phù hợp do hệ thống quản lý giám sát trách nhiệm xã hội chưa hoàn chỉnh. Xin xem các phần PA tương ứng

Question: 1.5 Is there satisfactory evidence that the auditee monitors how its business partners observe the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with BSCI Social Requirements, the auditee should have as a good overview of the significant business partners and their level of alignment with the BSCI Code of Conduct.

Based on the document review, the facility has established and updated selection criteria of business partners procedure and WI based on social performance in alignment with the BSCI CoC since December 2024. The facility also requested all business partner to signed an acknowledgement to ensure their commitment with Amfori BSCI COC. However, there was no evidence to prove that the monitoring and selection program and evaluation program was implemented.

Dựa vào xem xét hồ sơ, ghi nhận rằng công ty có tiêu chuẩn để đánh giá, lựa chọn đối tác kinh doanh, nhà máy có yêu cầu các đối tác ký bản cam kết tuân thủ theo tiêu chí trách nhiệm xã hội qui định tương đồng với tiêu chuẩn BSCI. Tuy nhiên, hoạt động giám sát và lựa chọn và đánh giá chưa thực hiện.



PA 2: Workers Involvement and Protection

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site

amfori ID: 704-002120-001

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with amfori BSCI Code of Conduct requirement on Workers Involvement and Protection, "Business enterprises should establish good management practices that involve workers and their representatives in sound information exchange on workplace issues, and allow for appropriate measures for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct. Business enterprises should take specific steps to make workers aware of their rights and responsibilities."

As per document review, it was noted that the facility has not established the long-term goals for protecting employees in line with the aspiration of BSCI Code Of Conduct.

Ghi nhận nhà máy chưa thành lập được mục tiêu dài hạn để bảo đảm quyền lợi của người lao động theo tiêu chuẩn BSCI.

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with BSCI Social Requirements, the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation

Based on the document review, the facility has established written procedure of grievance mechanism with suggestion box, and other alternative ways for lodging complaints such as hotline. However, facility did not have any relevant record on the grievance procedure.

Công ty có thiết lập quy trình xử lý khiếu nại thông qua họp thư góp ý và có đa dạng các kênh để thu thập ý kiến phản hồi từ công nhân như đường dây nóng. Tuy nhiên, công ty chưa có lưu giử bất kỳ hồ sơ liên quan về khiếu nại của người lao động.

PA 5: Fair Remuneration

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site amfori ID: 704-002120-001

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with amfori BSCI Code of Conduct requirement on Fair Remuneration, "Business partners observe this principle when they respect the right of the workers to receive fair remuneration that is sufficient to provide them with a decent living for themselves and their families, as well as the social benefits legally granted, without prejudice to the specific expectations set out hereunder."

cơ bản và các loại phụ cấp cố định) cao hơn mức lương theo nhu cầu cơ bản được tính. Tuy nhiên công ty chưa tiến hành khảo sát mức hoặc tính toán mức lương theo nhu cầu cơ bản cho công nhân.

Công ty đang trả mức tổng lương (bao gồm lương

Based on total wage of employees including basic wage and all kind of fixed allowances, the facility is paying above living wage calculated by auditor to employees. However, the facility did not conduct survey or calculate living wage for employees.

PA 6: Decent Working Hours

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site amfori ID: 704-002120-001

Question: 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

ENGLISH LOCAL LANGUAGE

Finding

Vietnam Labor Code, No. 45/2019/QH14, Article 107. Overtime work, 2. An employer has the right to request an employee to work overtime when all of the following conditions are met: a) The employee agrees to work overtime; b) The number of overtime working hours of the employee does not exceed 50% of the normal working hours in 01 day; in case of weekly work, the total normal working hours plus overtime working hours shall not exceed 12 hours in 01 day, and 40 hours in 01 month. Document review, and management interview, employee interview indicated that: 1. Excessive monthly overtime was found in December 2024 and September 2024. They worked from 50 to 52 overtime hours in December 2024 (4 samples), 45 overtieme hours in September 2024 (2 samples), instead of maximum 40 overtime hours per month.

Ghi nhận tăng ca vượt 40h/tháng trong tháng 9 và 12.2024.

PA 7: Occupational Health and Safety

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site amfori ID: 704-002120-001

Question: 7.3 Is there satisfactory evidence that the auditee set up an effective management system that ensures they regularly carry out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with BSCI Social Requirements PA 7.03, the audited facility should regularly carry out risk assessment for safe, healthy, and hygienic working conditions.

Law on occupational safety and hygiene (Law No. 84/2015/QH13), Article 77. Assessment of risks to occupational safety and hygiene, 2. The employer must assess and instruct employees to self-assess hazards of occupational safety and hygiene before working, during the course of work or when necessary. 3. With regard to fields or occupations posing high risks of occupational accidents and occupational diseases, the risk assessment of occupational safety and hygiene shall be compulsorily applied and specified in the internal regulations and working process.

It was noted that the facility has conducted health and safety risk assessment on all production section on 14 April 2025. However, risk assessment on transmittable and non-transmittable diseases in work environment and consideration the special needs of the most vulnerable workers such as pregnant workers and new mothers was not conduct at this facility.

Nhà máy có làm bảng nhận diện và phân tích rủi ro an toàn lao động nhưng chưa có nhận diện mối nguy bệnh truyền nhiễm và không truyền nhiễm hiện diện tại nơi làm việc và lao động nữ có thai và sau sinh.

Question: 7.4 Is there satisfactory evidence of active cooperation between management and workers (and/or their representatives) when developing and implementing systems towards ensuring OHS?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with amfori BSCI Code of Conduct requirement on Occupational Health and Safety, "The active co-operation between management and workers, and/or their representatives is essential in order to develop and implement systems towards ensuring a safe and healthy work environment. This may be achieved through the establishment of Occupational Health and Safety Committees."

It was noted that the facility did not provide any satisfactory evidences of active cooperation

Ghi nhận rằng nhà máy chưa có cung cấp bằng chứng thốa đáng cho thấy sự hợp tác giữa ban giám đốc và công nhân hay đại diện người công nhân khi thực hiện việc nhận diện & phân tích rủi ro tại các nơi làm việc trong nhà máy.

Finding

between management and workers (their representatives) when developing and implementing a risk assessment system at all area in facility.

Question: 7.9 Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?

LOCAL LANGUAGE ENGLISH Finding Ghi nhận không có dán biển cảnh báo vật rơi tại Law on occupational safety and hygiene (Law No. 84/2015/QH13), Article 16. Responsibility of the khu vực kho thành phẩm. Ghi nhận có biển báo an toàn tại khu vực sản xuất. employer for assurance of occupational safety and hygiene at the workplace, 6. There are warning, and instruction signs made in Vietnamese and popular language of employees in relation to occupational safety and hygiene for machinery, equipment, materials and substances that having strict safety and hygiene requirements at the workplace, preservation places, usage places that are placed at obvious locations. Based on the facility tour and management confirmation, it was noted that there was no warning sign "Falling" to remind workers and visitors at finished goods warehouse. Remark: The facility has posted the proper safety warning signs at production areas.

Question: 7.10 Is there satisfactory evidence that the auditee has and properly uses procedures and systems for reporting and recording occupational accidents and injuries?

ENGLISH	LOCAL LANGUAGE
Finding	
In accordance with BSCI Social Requirement, the auditee should have and properly use procedures and systems for reporting and recording occupational accidents and injuries. Based on the document review, the facility did not have written procedures and system for reporting and recording accident and injuries in place.	Công ty chưa thiết lập quy trình báo cáo và lưu hồ sơ các tai nạn lao động.

Question: 7.17 Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?

ENGLISH LOCAL LANGUAGE

Finding

In accordance with Law on occupational safety and hygiene (Law No. 84/2015/QH13), Article 23. Personal protective equipment, 1. Every employee who does dangerous or harmful works shall be adequately provided with personal protective equipment by the employer and he/she is required to use it during the course of work. 3. The employer shall provide personal protective equipment according to following rules: a) Provide personal protective equipment in conformity with their types, entities, quantity, quality assurance according to national technical regulations and standards; b) Do not give money instead of providing personal protective equipment; do not compel employees to self-buy or collect money from employees to buy personal protective equipment; c) Give instructions and observe employees using personal protective equipment.

During the facility tour, it was noted that 2 out 10 observed CNC machines at the cutting area were open during working time. Note: All machinery is labeled with safety warnings, and the factory has also provided for all workers with training on machine safety.

Ghi nhận 2 out of 10 máy CNC tại khu vực cắt đang mở trong khi máy đang hoạt động.

Question: 7.18 CRUCIAL: Is there satisfactory evidence that the auditee ensures qualified first-aid is available at all times?

ENGLISH LOCAL LANGUAGE

Finding

Circular No: 19/2016/TT-BYT on guidelines for occupational health and safety management, Article 6. Requirements for first aid kits, 1. First aid kits shall be available in the workplace, at accessible and visible positions, with Red Cross symbol thereof. 2. Quantity of first aid kits and items thereof shall be conformable to Annex 4 hereof (27 supplies).

It was noted that 01 out of 03 observed first aid kit of production workshop were provided with insufficiently first aid supplies (only 23 items instead of 27 items as per legal requirement).

Remark: First aid kit at other areas were provided full 27 items.

Tủ thuốc chỉ trang bị 23/27 danh mục sơ cứu bên trong tại khu vực sản xuất.

PA 13: Ethical Business Behaviour

Site: BRANCH OF TOAN TAM PHAT PRODUCTION - TRADING - SERVICES COMPANY LIMITED | Site amfori ID: 704-002120-001

Question: 13.1 Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?

ENGLISH

LOCAL LANGUAGE

Finding

In accordance with Amfori BSCI Code of Conduct requirement on Ethical Business Behaviour, "Business partners observe this principle when, and without prejudice to the goals and expectations set out in this chapter, they are not involved in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to the promising, offering, giving or accepting of any improper monetary or other incentive." Based on management interview, it was noted that the facility has established the policy to prohibit any act of corruption, extortion, or embezzlement, and provided ethics and integrity in trainings given to workers and managers regularly. However, they have not identified where the major risks of corruption could occur.

Ghi nhận nhà máy có xây dựng chính sách và cơ chế hành động phòng chống tham nhũng, sự tống tiền, hoặc bất cứ hình thức hối lộ nào trong hoạt động kinh doanh của công ty, và có lồng ghép phần tuyên truyền đạo đức và liêm chính cho CB-CNV. Tuy nhiên, chưa có nhận diện bộ phận nào rủi ro tham nhũng có thể xuất hiện.