
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**GUANGYUAN
LINFENG ALUMINUM
& ELECTRICITY CO.,
LTD**

CERTIFICATE
NUMBER

224

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SGS-CSTC
STANDARDS
TECHNICAL
SERVICES

DATE OF ISSUE

22 NOVEMBER 2022

DATE OF EXPIRY

21 NOVEMBER 2025

CERTIFIED SINCE

22 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a light green background.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

CERTIFICATION SCOPE

Manufacture of electrolytic aluminum liquid at
Guangyuan Linfeng Aluminium & Electricity Co.,
LTD.

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
ENTITY NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
CERTIFICATION SCOPE	Manufacture of electrolytic aluminum liquid at Guangyuan Linfeng Aluminium & Electricity Co., LTD.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Smelting
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	11 – 13 July 2022
AUDIT REPORT SUBMISSION	4 September 2022
AUDIT SCOPE	<p>The audit scope included the aluminium smelting processes for the manufacture of electrolytic aluminum liquid at Guangyuan Linfeng Aluminium & Electricity Co., LTD.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Smelting <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

22 November 2022 – 21 November 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

21 May 2024

CERTIFICATE
NUMBER

224

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a Management System to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has established an Anti-Corruption procedure consistent with international standards and state regulations. However, it was identified the procedure lacks the requirement to control the risk of Extortion.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct that includes principles relevant to environmental, social and governance performance. All employees are trained on these principles. The Entity has reviewed compliance with the Code of Conduct.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established and implemented an environmental, social and governance Policy. The Company ASI Policy is available on the Entity's website: http://www.zfsy.com.cn/lfdinfo.html The Entity has developed a series of procedures to implement the Policy and regularly review the performance.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented an environmental, social, and governance Policy that has been approved by the General Manager. The Policy is reviewed annually.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has implemented an environmental, social and governance Policy that is available on the bulletin board in the factory and on the website: http://www.zfsy.com.cn/lfdinfo.html
2.2 Leadership	Conformance	The Entity has nominated the Vice Chief Engineer as the senior Management Representative with the overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Energy, Environmental, and Occupational Health and Safety Management Systems. The Entity's Management System is certified to ISO 14001.
2.3b Environmental and Social	Conformance	The Entity has established a Social Accountability

CRITERION	RATING	COMMENT
Management Systems (social)		Management System that conforms to SA 8000 (not yet certified), and which includes various policies, procedures and a management manual.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues: http://www.zfsy.com.cn/lfdinfo.html Implementation of the Responsible Sourcing Policy addresses the establishment and completion of the supplier evaluation checklist and supplier audit plan. However, one supplier evaluation record reviewed indicated that not all requirements had been met.
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and human Rights Impact Assessments for New Projects or Major Changes to existing facilities. The impact assessment for the Entity's establishment covered air, water, soil, groundwater, acoustic environment, social, local human health and community was approved by the local authority and the report is made publicly available.
2.6 Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans, which have been registered with the local authority. Drills are undertaken as per the plan and the effectiveness of the drills are evaluated.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. To date, no mergers or acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the planning process for closure, decommissioning and divestment. To date, no closure, decommissioning or divestment has occurred.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social and economic impacts in the 2021 Sustainability Report: http://www.zfsy.com.cn/uploadFiles/files/20220711164727.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has disclosed in a compliance operation report that there has been no significant fines, judgements, penalties and non-monetary sanctions for failure to comply with Applicable law during 2021: http://www.zfsy.com.cn/uploadFiles/files/20220711164727.pdf

CRITERION	RATING	COMMENT
		621.pdf This has been verified on the National Enterprise Credit Information System.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has established management procedures that address payments to government and prohibit any payment other than in legal compliance. A third party financial audit report has verified the Entity's transactions.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented an accessible Complaints Resolution Mechanism, as evidenced in their information communication management program and the complaints control procedure. Complaints can be made via the contact details available on the website: http://www.zfsy.com.cn/lxwm.html
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of Aluminium liquid. The Life Cycle Assessment (LCA) research scope addressed four stages of the electrolytic Aluminium production life cycle, including raw material acquisition, raw material transportation, smelting production and downstream product disposal. The LCA Report is publicly available and discloses the energy/resource consumption and pollutant emissions per tonne of product during each stage: http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental LCA report can be provided via external communication channels as required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA report is published on the Entity's official website: http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Minor Non-Conformance	The Entity has documented and implemented standard operating procedures for the recycling of Aluminium Process Scrap. However, a target for the collection, recycling and/or re-use of scrap has not been established.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable as the Entity only produces Aluminium liquid.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable as the Entity only produces Aluminium liquid and does not generate a waste product. Aluminium Process Scrap generated from cleaning residual anodes can be recycled into the electrolysis cell.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable as the Entity only produces Aluminium liquid and does not generate a waste product.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated its Greenhouse Gas (GHG) Emissions, which have been verified by a third party. GHG Emissions are disclosed in an annual GHG Emissions Evaluation Report: http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf The Entity's Energy Report is publicly available: http://www.zfsy.com.cn/uploadFiles/files/20220712164249.pdf
5.2 GHG emissions reductions	Conformance	The Entity has published timebound GHG Emissions reductions targets in the 2022 GHG Emissions Reduction Plan: http://www.zfsy.com.cn/uploadFiles/files/20220825162408.pdf
5.3a Aluminium Smelting (management system)	Conformance	The Entity has implemented an Energy Management System and obtained ISO 50001:2018 certification. The Entity has publicly disclosed the GHG Emissions Evaluation Report: http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has calculated its GHG Emissions, which are verified by a third party, and implemented a GHG Emissions Reduction Plan to reduce emissions to below 8 tonnes CO ₂ -e per metric tonne Aluminium by 2030.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the Entity commenced production prior to 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has quantified and reported Emissions to Air that have adverse effects on humans or the environment:

CRITERION	RATING	COMMENT
		http://www.zfsy.com.cn/uploadFiles/files/20220711165017.pdf The Entity has installed waste gas treatment facilities according to the Environmental Impact Assessment (EIA) report to minimise adverse impacts.
6.2 Discharges to Water	Conformance	The Entity has quantified and reported Discharges to Water that have adverse effects on humans or the environment: http://www.zfsy.com.cn/uploadFiles/files/20220711165017.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has assessed major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. The risk assessment report is publicly available: http://www.zfsy.com.cn/uploadFiles/files/20220711164713.pdf
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has assessed major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. The Entity has established an Emergency Response Plan for environmental incidents to prevent and detect Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented a procedure to disclose to Affected Parties, the volume, type and potential impact of significant Spills immediately after an incident and in accordance with local legal requirements. There have been no Spills since the Entity's establishment.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented a procedure to disclose to Affected Parties, the volume, type and potential impact of significant Spills immediately after an incident and in accordance with local legal requirements. The Entity publicly discloses the Impact Assessments of Spills and remediation actions taken, and publicly reports on an annual basis. There have been no Spills since the Entity's establishment.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy, which includes the waste transferred to qualified suppliers for treatment and the reuse of Aluminium ash. Workshop employees are trained in the steps to minimise waste generation.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The Entity discloses the

CRITERION	RATING	COMMENT
		Hazardous and Non-Hazardous Waste generated and the methods of disposal: http://www.zfsy.com.cn/uploadFiles/files/20220711165029.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and responsibilities. SPL material including the lining material and refractory brick is reused. SPL is stored in a suitable and dedicated area.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and responsibilities. SPL material including the lining material and refractory brick is reused. SPL not reused is treated as Hazardous Waste and transferred to a qualified supplier for disposal in accordance with the legal requirement.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and responsibilities. SPL not reused is treated as Hazardous Waste and transferred to a qualified supplier for disposal in accordance with the legal requirement.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and responsibilities. SPL not reused is treated as Hazardous Waste in accordance with the legal requirement.
6.7e Spent Pot Lining (SPL)	Conformance	The Entity had implemented a Spent Pot Lining

CRITERION	RATING	COMMENT
(marine and aquatic environments)		(SPL) management procedure that addresses the storage of SPL and responsibilities. The Entity does not discharge SPL to marine or aquatic environments.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resource Management Report and Environmental Impact Assessment Report. The Entity's water is supplied by a local municipal water supply and all wastewater is recycled.
7.1b Water assessment (risk assessment)	Conformance	The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resource Management Report and Environmental Impaction Assessment Report. The water-related risks in the Entity's Area of Influence have been assessed: http://www.zfsy.com.cn/uploadFiles/files/20220711164702.pdf The risk assessment identified the Entity's risk as low.
7.2a Water management (management plans)	Conformance	The risk assessment identified the Entity's water-related risk as low. The Entity has recorded its water usage monthly and does not discharge wastewater. An emergency plan for discharging water in extraordinary situations is established and the Entity has provided training on the emergency plan to all employees.
7.2b Water management (monitoring)	Conformance	The risk assessment identified the Entity's water-related risk as low. The Entity's water resource monitoring plan has been effectively implemented.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water withdrawal and use and its water-related risks in the Water Resources Assessment Report: http://www.zfsy.com.cn/uploadFiles/files/20220711164702.pdf
PRINCIPLE 8 BIODIVERSITY		

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	<p>The Entity is located in an industrial park developed by the local government. An Environmental Impact Assessment (EIA) was undertaken for the Entity's new plant construction project in 2019, which assessed the risk and materiality of the impact on Biodiversity from the land use and activities in the Entity's Area of Influence. The EIA has been approved by the local government and published on the authority's website.</p> <p>Habitat degradation due to air and water pollution was identified as the main risk to biodiversity. As such, the Entity has established and implemented management plans to monitor Emissions to Air and Discharges to Water.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has established a Biodiversity Action Plan, implemented control measures and reported on the outcomes: http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf</p> <p>The Entity has implemented management plans to monitor the air emissions and wastewater discharge to address impacts to biodiversity.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has established a Biodiversity Action Plan based on the findings of the EIA for the Entity's new plant construction project in 2019 and the EIA associated with the government development of the industrial park. These assessments determined that the Entity was not located in farmland, a construction expansion restricted zone or prohibited zone (ecological preservation area).</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has published the outcomes of biodiversity management in the Biodiversity Assessment Report: http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf</p>
8.3 Alien Species	Conformance	<p>The Entity has established a procedure to prevent the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity.</p>
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy including a policy commitment to respect Human Rights. The Policies are available for internal and external stakeholders via training, posts on-site and publication on the website, refer to the Company ASI Policy: http://www.zfsy.com.cn/uploadFiles/files/20220711164548.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Due Diligence Procedure that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Entity has published a Human Rights Due Diligence Report: http://www.zfsy.com.cn/uploadFiles/files/20220711164606.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	There were no Human Rights violations found at the Entity. The Entity has published a Human Rights Due Diligence Report: http://www.zfsy.com.cn/uploadFiles/files/20220711164606.pdf
9.2 Women's Rights	Conformance	The Entity has established a Women's Rights Management Procedure that clearly defines the protection of women's rights.
9.3 Indigenous Peoples	Conformance	The Entity has established and implemented an Indigenous Peoples management procedure that includes the Entity's commitment to respect the rights and interests of Indigenous Peoples. There are no Indigenous Peoples in the industrial park where the Entity is located.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Entity has established an Indigenous Peoples Protection and Free, Prior, and Informed Consent (FPIC) Procedure. However, there are no Indigenous Peoples in the industrial park where the Entity is located.
9.5 Cultural and sacred heritage	Conformance	The Entity has established and implemented an Indigenous Peoples Procedure. The Entity is located in an industrial park that does not include cultural or sacred heritage sites or values.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has established a Resettlements Management Procedure. The Entity is located in an industrial park and Resettlement was not required.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has established a Resettlements Management Procedure. The Entity is located in an industrial park and Resettlement was not required.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established a Local Communities Management Procedure that addresses the Entity's commitment to respect the rights of Local Communities. The Entity is located in an industrial park.
9.7b Local Communities (impacts)	Conformance	The Entity has established a Local Communities Management Procedure that addresses appropriate steps required to prevent and address any adverse impacts. The Entity has established a communication procedure with external stakeholders.
9.7c Local Communities (livelihoods)	Conformance	The Entity is committed to exploring with Local Communities the opportunities to respect and support their livelihoods. The Entity employs people from the Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located within a Conflict-Affected and High-Risk Areas (CAHRAs) and does not contribute to or support suppliers in CAHRAS.
9.9 Security practice	Conformance	The Entity has defined a security practice management procedure and implemented security practices that respect Human Rights. No Human Rights violations related to security were identified.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity had defined a Freedom of Assembly Association Procedure that addresses the Freedom of Association and Right to Collective Bargaining. The trade union and local Chinese Communist Party branch have been established according to Chinese law requirements (Chinese Trade Union Law).
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity had defined a Freedom of Assembly Association Procedure that addresses the Freedom of Association and Right to Collective Bargaining. The Collective Bargaining Agreement is established between the employer and employees according to local regulations.
10.1c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has implemented trade union activities according to local regulations, including undertaking

CRITERION	RATING	COMMENT
(alternative means)		trade union representatives' meetings at planned intervals.
10.2a Child Labour (minimum age)	Conformance	The Entity has documented and implemented a Policy that prohibits Child Labour. There is no Child Labour or young Workers in the Entity, the youngest Worker was 21 years old.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. There is no Child Labour or young Workers in the Entity
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. There are no Workers under 18 years old in the Entity.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour and is not involved in Forced Labour, including slavery and Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. All Workers are hired directly, and Workers are not required to provide any form of deposit, Recruitment Fee or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. There are no foreign Migrant Workers in the Entity.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. The Entity has not provided any type of loan to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. There is no restriction on the Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. The Entity does not retain the Workers' original documents, only copies are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. Workers can terminate their employment with a specific notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the Labour Contract Law.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination management procedure and an employee handbook that outlines Anti-Discrimination rules for Workers. Employees understand the requirements and there has been no case of Discrimination received.
10.5 Communication and engagement	Conformance	The Entity has established a communication and participation management procedure to ensure direct and frequent communication with the Workers and Workers' representatives. There is a suggestion box in the workshop where Workers can raise concerns or complaints.
10.6 Disciplinary practices	Conformance	The Entity has established a disciplinary management procedure. Disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved.
10.7a Remuneration (living wage)	Conformance	The Entity has established a compensation and benefits management procedure. All Workers are enrolled in the mandatory social insurance scheme and average wages exceed the local mandatory wage.
10.7b Remuneration (method of payment)	Minor Non-Conformance	All Remuneration payments are documented and timely paid to all Workers according to contract. However, it was found that a Worker had wages deducted due to lateness. Also, there is a clause in the security management measures that allow a deduction in the wages of security guards due to absenteeism.
10.8 Working Time	Minor Non-Conformance	The Entity has established a working hours management procedure and Working Time is monitored and recorded in compliance with Chinese Labour Law. However, based on the site attendance records, it was identified that some employees had worked continuously for seven days without a day of leave, which is in violation of the legal requirement.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification. The OH&S Policy is published in the Company ASI Policies: http://www.zfsy.com.cn/uploadFiles/files/20220711164548.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and	Conformance	The Entity has established an OH&S Policy that applies to all Workers and Visitors.

CRITERION	RATING	COMMENT
visitors)		
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established an OH&S Policy that includes a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and safety including where relevant ILO Conventions 155.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established an OH&S Policy that addresses the Workers right to understand the hazards and safe practices and the right to refuse or stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification. However, a review of documentation found that three employees' physical examination reports were not available.
11.3 Employee engagement on health and safety	Conformance	The Entity has established an OH&S Management System that addresses the participation and engagement of Workers on OH&S issues.
11.4 OH&S performance	Conformance	The Entity has established an OH&S Management System that addresses the evaluation of performance.

Document Control and Version History

Revision	Date	Notes
0	22 November 2022	Initial Certification Audit – Full Certification