

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Suntown Technology Group Corporation Limited

CERTIFICATE NUMBER
25

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
TÜV SÜD

DATE OF ISSUE
13 JUNE 2023

DATE OF EXPIRY
12 JUNE 2024

CERTIFIED SINCE
30 APRIL 2019

AUTHORISED BY

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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Suntown Technology Group Corporation Limited including the aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Suntown Technology Group Corporation Limited
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	Suntown Technology Group Corporation Limited including the aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (12 – 15 March 2019)Re-Certification Audit and Scope Change (28 -29 September 2022)
AUDIT FIRM	TÜV SÜD
AUDIT DATE	<ul style="list-style-type: none">12 – 15 March 2019 (Initial Certification Audit)28 –29 September 2022 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 April 2019 (Initial Certification Audit)6 January 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 15 March 2019)</u></p> <p>The audit scope covered Suntown Technology Group Corporation Limited including the aluminium re-melting, re-refining and re-cycling and semi-fabrication activities with the manufacture of aluminium foil at the sites in Changsha and Changde (China).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation) <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit and Scope Change (28 – 29 September 2022)</u></p> <p>The audit scope covered Suntown Technology Group Corporation Limited including the aluminium re-melting, re-refining and re-cycling and semi-fabrication activities with the manufacture of aluminium foil at the sites in Changsha and Changde (China).</p>

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

All applicable criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME

- Provisional 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

13 June 2023 – 12 June 2024

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

13 December 2023

CERTIFICATE NUMBER

25



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Founded in 2003, Suntown Technology Group (SNTG) is a leading aluminium producer in China and one of the world's largest manufacturers of light gauge foil. SNTG has a presence in a wide range of businesses including aluminium formwork, aluminium van trailer/petroleum trailer, light gauge foil, and aluminium industrial extrusion. It is located within two industrial parks (Changsha Industrial Park and Changde Industrial Park) covering a total area of 2,700,000 sqm.

Suntown Technology Group Corporation Limited Certification Scope includes the aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of aluminium foil at the sites in Changsha and Changde (China).

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to identify Applicable Law/regulations, which outlines the legal department as responsible for the identification of Applicable Law and its assessment at least annually and covers labour, ethics, health and safety, and environmental issues.
1.2 Anti-Corruption	Conformance	The Entity has established ethics procedures, addressing anti-Bribery, Corruption, anti-trust, and conflict of interest. The risk assessment on ethics is conducted annually. The Entity has posted information on the reporting channel in the meeting room at the main gate of the Facility. The Entity has investigated high-risk positions, including purchasing, sales, quality, and design departments, and has provided training on business ethics to employees, where relevant.
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct against the ASI Performance Standard. The Entity has also communicated the Code of Conduct to its suppliers who must sign it to demonstrate their commitment. The Entity reviews the Code of Conduct annually and also reviews the Code for where any changes to the Business alter Material environmental, social and governance risks. Training is provided to relevant training to Workers annually.</p> <p>The Code of Conduct is available at (link located at the bottom of the page): www.chinasnto.com/project/susreport.html</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established an environmental, social and governance Management System, senior management has endorsed the Policies and support through the provision of resources. The ASI Performance Standard manual was developed and implemented, and the Changsha site has obtained ISO14001 certification. The Policies are posted on-site and communicated with employees. Training is also undertaken for relevant employees.</p> <p>The Polices are available at: http://www.chinasnto.com/project/susreport.html</p>
2.2a-c Leadership	Conformance	A senior Management Representative has been appointed to lead the communication of key Policies. This representative is provided with the resources needed to establish, implement, maintain and improve the Management Systems
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity's Changsha site Management System is certified to ISO 14001. The Entity has implemented an internal audit and management review procedure to review the EHS Management System for the Changde site.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and implemented a Social Management System which includes both an internal audit and management review procedure to review the Social Management System for both the Changsha and Changde sites.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity is committed to responsible sourcing and has implemented a Responsible Sourcing Policy. Responsible sourcing is implemented by the Entity via supplier assessments and emphasising to its suppliers to implement the ASI Standards.</p> <p>The Policy is reviewed at least every five years, or on any significant change, as stipulated in the Policy. Conformance to, and the effectiveness of the Policy is assessed during internal audits.</p> <p>The Responsible Sourcing Policy is available at: www.chinasnto.com/project/susreport.html</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has assessed their impacts regarding the environment, health and safety, and social responsibility including Human Rights at least annually. Environmental and Social Impact Assessments (ESIA) will be conducted for New Projects or Major Changes to existing Facilities, as a stipulation in its Policy. The environmental and social impact management plan is reviewed at least every five years or when a significant change occurs. A Corrective Action Plan (CAP) is developed and implemented for any non-conformances identified.</p> <p>The conducted ESIA's are available in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has assessed their impacts regarding social responsibility including Human Rights annually, including how Baseline Conditions are affected by Historic Aluminium Operations. The Human Rights Impact Assessment includes an assessment of Indigenous Peoples' rights. There is no presence of Indigenous Peoples where the Entity operates. As per the procedure, the Human Rights impact management plan is reviewed at least every five years or when a significant change occurs. A Corrective Action Plan (CAP) is developed and implemented for any non-conformances identified.</p> <p>The conducted Human Rights Impact Assessment is available in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has adequate and effective Emergency Response Plans (ERP) that addresses crisis organisation, communication guidelines and business recovery plans. An Emergency Response Team (ERT) is established and is trained annually. The ERP for Environment, Health, and Safety (EHS) is registered with the local bureau. Drills for the ERP are performed annually. The ERP is available upon request.</p>
2.8a-d Suspended Operations	Minor Non-Conformance	<p>The Entity has implemented Emergency Response Plans. The business resilience plan addresses situations where it may have to suspend or significantly alter operations due to factors outside its control. A Corrective Action Plan (CAP) is developed for any non-conformances identified. The Entity discloses the performance of its Business Resilience Plan in the Sustainable Development Report, which is available on the Entity's website.</p> <p>However, it was identified that the Business Resilience Plan contains insufficient information in relation to social risks.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The SNTO Group manages all Mergers and Acquisitions. The Due Diligence process is managed and organised by SNTO Group.</p>

CRITERION	RATING	COMMENT
		procedures are relevant for the Entity. There have been no Mergers or Acquisitions related to the Entity in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The SNTO Group manages all closures, decommissioning and divestment. Procedures and investigations are established for the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed and implemented Policies, procedures and processes that conform to the Sustainability Reporting requirements and has established a communication procedure for communication with Stakeholders including the government on environmental, social and economic impacts. The Entity publicly discloses its governance approach in the Sustainable Development Report, pages 7-8 and 22-26: http://www.chinasnto.com/project/susreport.html
3.2 Non-compliance and Liabilities	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the Sustainability Reporting requirements. Information on governance performance is disclosed in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html
3.3a-c Payments to Governments	Conformance	<p>The Entity provides information on non-compliances and liabilities and its governance approach via the Sustainable Development Report. The Entity has developed and implemented Policies and procedures which conform to these anti-Corruption requirements. Employees in both the Financial and Human Resources departments were interviewed in relation the payments to the Government, including taxes and social insurance. This requirement is addressed via the Transparency and Anti-Corruption Policies' deployment: http://www.chinasnto.com/index.php/project/susreport.html</p> <p>The only tax i paid by the Entity is to the Government. There have been no fines, judgments, penalties, and non-monetary sanctions from the Government to date, and therefore no details are publicly disclosed.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established an adequate and effective Stakeholder (e.g, Qorker/manager, supplier and customer) communication process to address complaints, grievances and requests for information. http://www.chinasnto.com/project/susreport.html</p> <p>The Entity reviews the Complaints Resolution Mechanism and assesses it annually.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to Life Cycle Assessment (LCA) requirements. The LCA ('cradle to grave') has been undertaken for some major products and qualified by a third party. The LCA is available at: http://www.chinasnto.com/index.php/project/susreport.html

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to these LCA ('cradle-to-gate') information requirements. The Policies confirm that the Entity will publish the LCA information at: http://www.chinasnto.com/index.php/project/susreport.html
4.2 Product Design	Conformance	The Entity has established procedures for LCA in the products design process, the LCA is required to consider various environmental impacts including carbon, energy, consumption, water, air emission and waste etc. At present, Greenhouse Gas (GHG) emissions have been integrated into the design process, accompanied by clear sustainability objectives.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets for managing Process Scrap. The objectives and targets are issued for each process and are reviewed monthly. The Entity has implemented a procedure for the classification and disposal of the different types of Aluminium scrap. Scrap is recycled at the Changde site and monitoring records are maintained to show recycling rates.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established a Policy and procedures for internal Aluminium recycling. All the recycled products are managed at the Changde site, and the Facility has a clear plan (including specific timelines, activities, and targets) for the rate of Recycled Aluminium in its final products. The recycling strategy is reviewed at least every five years or when a significant change occurs. The recycling strategy is available in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has made efforts to influence the recycling rate through both product design and providing additional information on the product. They also engage with outside parties including suppliers and recycling companies to support accurate measurement and efforts to increase recycling rates in their respective markets for their Products containing Aluminium.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has communicated its Greenhouse Gas (GHG) emissions and energy reduction achievements in its Sustainable Development Report: http://www.chinasnto.com/project/susreport.html The GHG calculation and verification is undertaken by a qualified third party. There is a documented procedure for determining the Entity's Material GHG emissions and energy use by source. The methodology for determining direct and indirect (Scope 1, Scope 2) emissions is clear, readable and with auditable emissions data. The GRI reporting structure is used. However, it was identified that Scope 3 emissions are not calculated.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has provided GHG and energy monitoring records for review. The Entity communicates its GHG emissions and energy reduction achievements in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html</p> <p>The GHG calculation and verification is undertaken by a qualified third party. The carbon reduction plan includes actions including the improvement of work processes, selecting suppliers with low energy consumption per unit and the use of green electricity. The methodology for determining both direct and indirect emissions is also specified. The implementation of the plan is reviewed monthly.</p> <p>However, the GHG Emission Reduction Plan does not include both Intermediate Targets and a 2050 target, and a reduction pathway is not available. Specific GHG Emissions Reduction Pathways for each main emissions source need to also be developed.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established and uses a carbon Management system for both factories and products and obtained a carbon footprint statement from CQC. GHG and energy monitoring records are provided for review. An GHG Emission Reduction Plan has also been developed, which is incorporated as part of the Entity's business improvement strategies and plans. The methodology for determining direct and indirect emissions is also specified. The implementation of the Plan is reviewed monthly.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>Air emissions are routinely monitored (at least annually), and air emission control systems are routinely monitored for performance. The Entity has identified air emission sources and assessed air emissions by a qualified third party when the company was founded. The Entity has established a process for a) Treatment and b) Discharge of air emissions. It states the detail of the process a) to track, review, and approve the discharge of all air emissions b) the EHS department and facility department is responsible for all aspects of process air emission treatment. The Material Emissions to Air Plan is reviewed at least every five years or when a significant change happens. A CAP is developed for any non-conformance that has been identified.</p> <p>However, it was determined that the Entity currently does not publicly disclose air emissions.</p>
6.2a-g Discharges to Water	Conformance	The Entity has established a wastewater inventory to control the Discharges to Water. The industrial wastewater is collected as Hazardous Waste and transferred by a qualified third party. The domestic wastewater is discharged to the local municipal system after being pre-treated by an internal wastewater plant. Testing is conducted annually. The Entity has not received any punishment from the local bureau and no negative disclosure by any other party was identified during the audit. The Discharges to Water Plan is reviewed at

CRITERION	RATING	COMMENT
		<p>least every five years or when a significant change occurs. Corrective actions are developed as required.</p> <p>The Entity's discharge to water performance is available in the Sustainable Development Report: http://www.chinasnto.com/project/susreport.html</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has engaged a qualified third party to assess Spills and Leakages for both sites and develop Emergency Response Plans (ERP). The plans have been approved by the local bureau. Annual drill plans are established for the ERP. As per site observations, adequate and effective control measures have been implemented for all potential risks and no Spills and/or Leakages were identified.</p> <p>The Spills and Leakages management plan is reviewed at least every five years or when a significant change occurs. Corrective actions are developed as required.</p> <p>The Entity's performance of Management of Spills and Leakages is available at: http://www.chinasnto.com/project/susreport.html</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established Emergency Response Plans (ERP) for both sites, which address how to report to affected parties, rescue organisations and the local bureau. When a non-conformance is identified, an investigation is established for Spills/water channel contamination and a corrective/preventive action plan, root cause analysis and remediation action(s) are applied.</p> <p>More information is available at: http://www.chinasnto.com/project/susreport.html</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's Waste management procedure addresses the process for receiving, storage, dispensing and disposal. The Entity has implemented processes to appropriately collect and dispose of all waste and has continual improvement targets to reduce waste generation per unit. Targets are reviewed by the management team and approved quarterly. The impact of waste on people and the environment is also assessed annually. Hazardous Waste is collected and treated by a qualified company. Waste Transfer Reports are recorded on the Government platform.</p> <p>Information on the quantity of Hazardous and Non-Hazardous Waste is available at: www.chinasnto.com/project/susreport.html</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity has established a process to collect and recycle Aluminium Dross. The Entity has conducted monthly reviews of the management of Dross recycling and Dross residue is recycled by other companies for use in products such as construction materials. An annual onsite audit of the recycling company is conducted to ensure there is no landfilling of Dross residue. The Entity has established a plan to maximise the recovery of Aluminium by treatment of Dross residues and maximise the recycling of treated Dross residues.</p>

CRITERION	RATING	COMMENT
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has assessed its water consumption through the y engagement of a qualified third party via the Environmental Impact Assessment (EIA) reports (the risk is low, as per assessment) when the factories were founded, which indicated the water source is compliant with legal requirements and approved by the local bureau.</p> <p>The Entity's water assessments are available at: http://www.chinasnto.com/project/susreport.html</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's EIA risks are identified and assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has established procedures with a documented methodology for determining the Materiality of its impacts to Biodiversity and Ecosystem Services. The biodiversity risk assessment determined that the risk level is low.</p> <p>The Biodiversity assessment is incorporated as part of the Environment Impact Assessment reports which are performed by a qualified third party. The locations of the Entity are not in, nor near any Protected Areas. The Entity communicates the performance of biodiversity to interested parties including the local community and Government.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable as the risks and potential impacts identified are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the risks and potential impacts have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as Priority Ecosystem Services have been identified and the result of the biodiversity risk assessment determined the impact is low.
8.4 Alien Species	Conformance	The Entity has assessed the risk of Alien Species and implemented control measures for the high risks identified. An inventory of alien and/or invasive species is maintained and the Entity has implemented a management plan to proactively prevent the accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. Training records for personnel that work for, or on behalf of the Entity are aware of these management plans and controls. Management review is conducted annually.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity has an inventory of World Heritage Site listings, which includes current nominations for potential future World Heritage Sites.</p> <p>The Entity did not explore or develop New Projects or make Major Changes in World Heritage Properties. The Entity's existing operations are not located in World Heritage Properties. A relevant statement is developed and made public to necessary Stakeholders.</p>

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	<p>The Entity has checked and confirmed no there are Protected Areas within its Area of Influence via the EIA and an internal assessment. They have collected and complied with local regulations.</p> <p>The Entity has implemented management plans developed in collaboration with the community and government, including with the participation of Affected Populations and Organisations, to ensure their activities and Facilities do not adversely impact the integrity of the Area of Influence. The Entity publicly discloses the information via posters to the community. The Protected Areas management plan is reviewed at least every five years or when a significant change occurs.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity is committed to the whole group with Human Rights in its Code of Conduct: http://www.chinasnto.com/bocupload/file/晟通科技集团有限公司行为准则.pdf</p> <p>The Entity reviews the Code of Conduct annually and also reviews the code for where any changes to the Business alter Material environmental, social and governance risks. The Entity identifies the risk to Human Rights and provides training for all employees. It has a process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights through Social Management Questionnaire and no negative issues were found. An externally communicated helpline exists; the elected worker representation is the main contact for all complaints and topics from Workers.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>Women's legal rights and interests are respected, including equal rights in gender, voting and elections, education, employment, promotion, and maternal health. Each of these aspects are regulated by the SNTO Governance, Environmental and Social Performance Assurance Manual. No complaints have been received from women Workers.</p> <p>Report on the Effectiveness of Gender Equality and Women's Rights Protection Measures is available at: http://www.chinasnto.com/bocupload/file/关于性别平等、女职工权益保护措施的有效性报告.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity does not have projects that require relocation or transfer. No resettlements have been necessary as no local residents are affected by the site.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The two sites are in close contact with surrounding communities and the majority of its employees are from the local area. The Environmental Impact Assessment report indicates that the Facilities have installed environmental protection devices, such as an air emission treatment facility, to reduce the impact on the surrounding communities.</p> <p>The Entity has established a plan to support the surrounding communities, which is available at: http://www.chinasnto.com/bocupload/file/预防及减少对周边人群、组织负面影响的计划.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The adequate and effective Conflict Minerals Policy and management program is designed and implemented to reasonably assure that the tantalum, tin, tungsten, and gold (3TG) and aluminium in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from CAHRAs (OECD Due Diligence Guidance) or an equivalent and recognised in the Due Diligence framework.</p> <p>Conflict Minerals Management Procedure states the detail of the conflict minerals management program within its operations, including:</p> <ul style="list-style-type: none"> a) Identifying a senior management person responsible for the implementation of the Due Diligence program b) Including sourcing requirements in written contracts/commitment letters with suppliers c) Mitigate any risks identified in accordance with the OECD Due Diligence Guidance including suspending the business relationship with the supplier when the risk mitigation is unsuccessful d) Reviewing the procedures regularly to ensure conformance and improve where process improvements have been identified.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has identified and assessed risks in the supply chain through a supplier self-assessment, onsite or remote verification, media, government or international organisation's publication on the topic. Through the Entity's internal assessment, it has been determined that no materials have been sourced from CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	Through the Entity's internal assessment, no materials have been sourced from CAHRAs. However, the strategy to respond to identified risks, if they are identified in future, has been established.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted Due Diligence monitoring on its Aluminium supply chain and this ASI Audit provides an independent third-party audit of Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity does not contribute to armed conflict or Human Rights abuses in CAHRAs. The Annual report on supply chain Due Diligence is made available at: http://www.chinasnto.com/bocupload/file/负责任采购方针及供应链尽职调查.pdf</p> <p>Through the Entity's internal assessment, it has been determined that no materials have been sourced from CAHRAs.</p>
9.9 Security practice	Conformance	The Entity has implemented a security Policy that addresses Human Rights. The security guards are trained on rights and responsibilities in terms of respecting internal and external Stakeholders, including Workers.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Criterion is not applicable in China as there are laws that restrict Freedom of Association approval is needed to form a new Labour Union.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of association for Workers. A Workers' Council exists in the Entity.
10.2a Child Labour	Conformance	The Entity does not use Child Labour. The Entity neither engages in nor tolerates the use of Child Labour as defined in ILO Conventions C138 and C182 and is complying with related national and international law. Young Workers (from the age of 16 to 18) are under special protection. They are not allowed to work in any hazardous working environment. The Entity is not involved in or supporting the Worst Forms of Child Labour. The Entity commits itself, and expects its Contractors, to comply with the prohibition of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. No type of Forced Labour is found in the Entity. All employees are employed directly, no deposits, fees, or advances are required from employees. No deposits or security payments are permitted. There is no restriction on Workers' movement at the sites.</p> <p>The Entity neither engages in nor tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this</p>

CRITERION	RATING	COMMENT
		<p>Convention, and C105. The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.</p> <p>According to Workers' interviews and document review, Labour contracts were signed, and all employees' personnel files with the ID card photocopies were kept in the factory. Employees were not required to lodge any deposits or their identity cards with their employer when they were employed, and they were free to leave the factory with 30 days' notice in advance.</p> <p>The Modern Slavery Statement is available at: http://www.chinasnto.com/bocupload/file/%E6%99%9F%E9%80%9A%E7%8E%B0%E4%BB%A3%E5%A5%B4%E5%BD%B9%E5%A3%B0%E6%98%8E2022.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity operates in accordance with both its Code of Conduct and Human Rights Policy, which ensures equal opportunities regarding hiring, salary, promotion, and training, and does not allow for Discrimination based on gender, race, national origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. The Entity's employees are trained on non-Discrimination, and a grievance channel is available to report issues of potential Discrimination.
10.5 Communication and engagement	Conformance	It was evidenced that the Entity ensures open communication with Workers and their representatives regarding working conditions via the Workers' Council.
10.6a-g Violence and Harassment	Conformance	The Entity ensures open communication with Workers on working conditions and ensures that there is no threat of retaliation, intimidation, harassment, and no deduction of wages used as disciplinary practices. The Anti-Violence and Harassment Policy is available at: http://www.chinasnto.com/bocupload/file/昆通科技集团有限公司反对暴力与骚扰政策2021年.pdf
10.7a-c Remuneration	Conformance	The wage provided to Workers meets both the legal standard and the basic needs of Workers. All payments are documented and paid to the employees' bank accounts.
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours are recorded electronically. At the Changde site, it was identified the monthly Overtime exceeds 36 hours, and at times the weekly working hours exceeded 60 hours.</p> <p>At the Changsha site, it was identified the monthly Overtime exceeds 36 hours occasionally. In addition, annual leave provided to Workers is only based on the Working Time at the Entity's site and does not consider the cumulative Working Time of Workers' over an extended period of time.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity has communicated with Workers on their rights and responsibilities during orientation training and annual training, and through the labour contract. The interviewed employees understood the rights of Freedom of Association.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Major Non-Conformance	The Entity has established formal Policies for Occupational Health and Safety (OH&S) and posted them in the internal public areas. However, the management of occupational disease control, fire drills, building certificates, machine safety and emergency facilities has been determined as currently inadequate.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has established formal Policies for OH&S including legal compliance. Operational procedures would be reviewed periodically to enhance effectiveness. Further information on the effectiveness of the OH&S Management System is available at: http://www.chinasnto.com/project/susreport.html
11.2 Employee engagement on Health and Safety	Conformance	Environment, Health, and Safety Committees are established at both the Changsha and Changde sites. Committee meetings are undertaken regularly to understand the health and safety conditions of the factory and work to promote the development of the health and safety conditions of the Entity.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 January 2022	Initial Certification Audit – Full Certification
1	13 June 2023	Re-Certification and Scope Change Audit – Provisional Certification. Scope Change to apply PS V3. Change of Audit Firm to TÜV SÜD.