
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SUNTOWN TECHNOLOGY GROUP CORPORATION LIMITED

CERTIFICATE
NUMBER

25

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

30 APRIL 2019

DATE OF EXPIRY

29 APRIL 2022

CERTIFIED SINCE

30 APRIL 2019

AUTHORISED BY

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

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

*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, re-refining and re-cycling and semi-fabrication activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).

SUMMARY 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, re-refining and re-cycling 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 Remelting/Refining• Casthouse• Semi-Fabrication• Material Conversion
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	12 – 15 March 2019
AUDIT REPORT SUBMISSION	11 April 2019
AUDIT SCOPE	<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 Remelting / Refining• Casthouse• Semi-Fabrication• Material Conversion <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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">☑ 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	30 April 2019 – 29 April 2022
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	29 April 2020
CERTIFICATE NUMBER	25

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	Entity has established procedure to collect the applicable legal law/regulation, the legal department is charged for the legal law/regulation collection and assessment at least once per year, cover the legal law on labor, ethics, health & safety and environment sections. But some laws/regulations are not updated and some key legal law is missing.
1.2 Anti-Corruption	Conformance	<ol style="list-style-type: none"> 1. Entity has established the ethics policy/procedure, covered the anti-bribery, corruption. 2. The risk assessment on the ethics was conducted once per year. 3. The ethics reporting channel was posted in the meeting room at the main gate of the facility. 4. Entity has conducted the due-diligence investigation on the high risk positions in the facility, such as purchase, sales, quality, design departments. 5. Entity provides training on ASI performance standards, covering the ethics policy and procedures.
1.3 Code of Conduct	Conformance	Entity has established their code of conduct against the ASI performance standard, and provide training to workers in June 2018. They have communicated their code of conduct to their suppliers by signing the commitment.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Entity has established management system on environmental, social and governance compliance, the ASI performance standard manual have been established, Changsha site has obtained the ISO14001 certificate. The policy is posted on-site.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Management representative is appointed for labor, ethics, health & safety, environment, his responsibility was defined in the appointment letter. Strong commitment of SNTO (Suntown Technology Group Corporation Limited) management to the implementation of the management systems. The effectiveness of the system is reviewed during the annual management reviews.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	Entity has established ASI performance standard manual, including the policies and procedures which are publicly disclosed in the website http://www.chinasnto.com/index.php?m=content&c=index&a=sustaindevelop However, the policy is not communicated to workers clearly.
2.2 Leadership	Conformance	The Marketing Director has been appointed as management representative for labor, ethics, health & safety, environment, his responsibility was defined in the appointment letter.
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	Entity has obtained the ISO14001 certificate for Changsha site. Entity has established the internal audit and management review procedure to review the EHS management system in Changde site, but no root cause analysis is conducted on the non-conformance identified during the internal audit, and the management interview only covers the internal audit result, no other information is reviewed, such as legal law requirement, policy/procedures and etc..
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	Entity has established the internal audit and management review procedure to review the social management system in both Changsha and Changde site, but no root cause analysis is conducted on the non-conformance identified during the internal audit, and the management interview only covers the internal audit result, no other information is reviewed, such as legal law requirement, policy/procedures and etc..
2.4 Responsible Sourcing	Conformance	The Entity is highly committed to responsible sourcing. Responsible sourcing is implemented by SNTO through supplier assessments and emphasizing on its suppliers to implement ASI standards.
2.5 Impact Assessments	Conformance	The Entity has assessed impact regarding environment, health and safety, social responsibility including human rights, regularly.
2.6 Emergency Response Plan	Conformance	The Entity has adequate and effective emergency response plans (ERP). This includes crisis organization, communication guidelines and business recovery plans. Emergency

CRITERION	RATING	COMMENT
		response team (ERT) has been established and been trained annually. The ERP for health & safety and environment have been registered in local bureau. Drills of ERP are performed annually.
2.7 Mergers and Acquisitions	Conformance	All mergers and acquisitions are managed by SNT0 Group, the due diligence process is managed and organized by SNT0 Group. Group procedures are relevant for the Changde site and Changsha site. In the past 3 years, no merger or acquisition in SNT0 Group.
2.8 Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment is managed by SNT0 Group. Group procedures are relevant for the Changde site and Changsha site.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the sustainability reporting requirements. The Entity publicly discloses its governance approach and its Sustainable Development Report: http://www.chinasnto.com/index.php?m=content&cindex&a=sustaindevelop
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliances and liabilities. The Entity publicly discloses its governance approach and Sustainable Development Report http://www.chinasnto.com/index.php?m=content&cindex&a=sustaindevelop
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these anti-corruption requirements. This requirement is covered, through Transparency and Anti-corruption policies' deployment.
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	1. The Changsha site have obtained valid ISO14001 certificate. 2. The Entity has developed and implemented policies, systems, procedures and processes

CRITERION	RATING	COMMENT
		that conform to this criterion for stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from stakeholders and has an appropriate resolution mechanism.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these life cycle assessment (LCA) requirements. However, the LCA for major products have not been finished at the audit date, at present only one element (Greenhouse Gas (GHG)) has been assessed.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these LCA information requirements. The policies claim it will provide LCA upon request. However, because the LCA for major products have not been finished, it could not provide LCA information to customers at present, the assessment is still in progress.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these LCA information requirements. The policies claim it will publish the LCA information through the company public website:</p> <p>http://www.chinasnto.com/index.php?m=content&c=index&a=sustaindevelop</p> <p>However, because the LCA assessment for major products have not been finished, the publishing has not been performed.</p>
4.2 Product design	Minor Non-Conformance	The Entity has established procedures for LCA in products design process, the LCA shall consider various environment impacts including energy, consumption, water, air emission and waste. At present, GHG has been integrated into the design process. However, due to the overall LCA for major products not be finished, LCA (excluding GHG) could not be implemented in the design process and no target regarding the LCA factors is set up.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has clear targets for process scraps. The targets are issued to each process and are reviewed monthly.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has adequate and effective procedure to classify and dispose the different kinds of aluminium scraps. All the scraps are recycled by Changde site.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has informed its clients about the possibility to influence the recycling rate through product design and additional information on the product.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has formal policy and procedures for the internal aluminium recycling. All the recycled products have been managed by Changde site. The facility has clear target for the rate of recycled aluminium in final products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity communicates its GHG (Greenhouse Gas) emissions and energy reduction achievements in its annual CSR (Corporate Social Responsibility) report through website: http://www.chinasnto.com/index.php?m=content&c=index&a=sustaindevelop which is accessible for everyone. The GHG calculation is performed by qualified third party.
5.2 GHG emissions reductions	Minor Non-Conformance	The overall GH target is published and communicated to internal staff, from top management, responsible teams and workers thoroughly. The GHG target is available for public and any concerned stakeholders via communication with SNTO (snto@chinasnto.com) for more information. In detail, facility publishes and communicates the GHG target to external stakeholders as external report. The entity is planning to reduce CO ₂ -emission by 50% by 2020 and has made improvement programs covering direct emission sources and indirect emission sources to achieve the target. The management team annually reviews the progress. All the energy data is tracked and reviewed monthly. However, we notice there is improvement area for the facility – the existence of the GHG reduction target should be further specifically mentioned on the public website to allow the

CRITERION	RATING	COMMENT
		clear visibility of the existence of the GHG reduction target.
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	The Entity has assessed air emissions by a qualified third party when the Entity was founded and now has annually monitoring of the emissions. However, the management of air emissions is not adequate.
6.2 Discharges to Water	Minor Non-Conformance	The Entity has established wastewater inventory to control the discharges to water. The industrial wastewater is collected as hazardous waste and transferred by qualified third party. The domestic wastewater is discharged to local municipal system after pre-treated by internal wastewater plant. It has qualified third party to monitor final outlets annually. No punishment from local bureau or negative disclosure by other party was identified during the audit. However, the wastewater monitoring does not cover BOD (biological oxygen demand) as required by EIA (Environment Impact Assessment) report.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity engaged a qualified third party to assess the spill and leakage for both sites and established emergency response plans for them. The plans have been approved by local bureau. The assessment reports cover all the potential risks.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity engaged a qualified third party to assess the spill and leakage for both sites and established emergency response plans (ERP) for them. The plans have been approved by local bureau. It has made annual drill plans for the EPR. During the site observation, adequate and effective control measures are implemented for all the potential risks.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity engaged a qualified third party to assess the spill and leakage for both sites and established emergency response plans (ERP) for them. The plans have been approved by local bureau. The ERP includes information on how to report to affected parties, rescue organization and local bureau.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The Entity engaged a qualified third party to assess the spill and leakage for both sites and established emergency response plans (ERP) for them. The plans have been approved by local bureau. It is planning to publish the assessment result and ERP through the annual CSR report at end of 2019. However, during the audit, it was found that the Entity has not publicly disclosed the spills and leakage assessment information except to local bureau.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established adequate and effective processes to collect and dispose all the waste and has continual improvement targets to reduce the waste generation per unit. The targets are reviewed quarterly by management team.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity has established policy and procedure on how to publish the waste management information and this information has been published in the annual CSR report for 2018. However, the Entity needs to include more details, such as information regarding dispose procedure of hazardous waste.
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 (start 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.

CRITERION	RATING	COMMENT
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Conformance	The Entity has adequate and effective process to collect and recycle the aluminium dross.
6.8b Dross (recycling)	Conformance	All the collected dross is recycled by Changde site.
6.8c Dross (review of alternatives)	Conformance	The Entity has monthly reviewed the dross recycling management and the dross residue is recycled by other Entity to transfer to other products such as construction materials. The Entity has annually performed onsite audit for disposal Entity to ensure no landfilling of dross residue exits.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Minor Non-Conformance	The Entity assessed the water consumption by engaging a qualified third party through the EIA reports when the factories was founded, which indicated the water source is compliant with legal requirements and approved by local bureau. However, the Entity does not establish water mapping to regularly review the updates and changes.
7.1b Water assessment (risk assessment)	Minor Non-Conformance	The last water assessment was conducted in 2005 and not updated regularly. No major change is identified against the assessment of 2005.
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce the water consumption and has established programs to achieve the targets.
7.2b Water management (monitoring)	Conformance	The Entity has annual targets to continually reduce the water consumption and has

CRITERION	RATING	COMMENT
		established programs to achieve the targets. The targets and progress of programs are reviewed quarterly.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Entity has established policy and procedure on how to publish the water management information and this information has been published in the annual CSR report for 2018 and EIA reports. The published information includes water risks and control programs. However, the Entity needs to include more details, such as information regarding dispose methods and quantity of hazardous wastewater.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is covered by EIA reports which are performed by qualified third party. The Entity is not located at any protected areas.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has established action plans for the biodiversity management and the plans are approved by local environment bureau.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established action plans for the biodiversity management and the plans, which are consultative and designed in accordance with the biodiversity mitigation hierarchy, are approved by local environment bureau.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported its biodiversity management and outcomes through annual Corporate Social Responsibility report: http://www.chinasnto.com/index.php?m=content&c=index&a=sustaindevelop
8.3 Alien Species	Conformance	The Entity has annually assessed the alien species and taken control measures for the high risks.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.

CRITERION	RATING	COMMENT
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 commits the whole group in its code of conduct compliance with human rights. The Entity identifies the risk of human rights and provides the trains for all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has the process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity commits the whole group in its code of conduct compliance with human rights. An externally communicated helpline exists; the elected worker representation is the main contact for all complaints and topics from workers.
9.2 Women's Rights	Conformance	There are laws that restrict women working in positions designated as hazardous in China. However, the Entity commits itself in the code of conduct to the prohibition of discrimination and harassment. SNTO respects the rights and interests of women, sets activities to support work-life balance especially for women.
9.3 Indigenous Peoples	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as no cultural and sacred heritage is affected by Changsha and Changde site.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, as no resettlement is necessary - no local residents are affected by the site.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable, as no resettlement is necessary - no local residents are affected by Changsha and Changde site.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established ASI performance standard manual, and respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The two sites are in close contact with surrounding communities. Most of its employees are from the local area. Environmental impact assessment report indicates that the facility has installed environmental protection device, such as air emission treatment facility, to reduce the impact to the surrounding communities which is caused by air emission, boundary noise.
9.7c Local Communities (livelihoods)	Conformance	The two sites are in close contact with surrounding communities. Most of its employees are from the local area. Entity has established plan to support the surrounding communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established ASI performance standard manual and does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Through internal investigation, no material has come from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The security is provided through own staff. Staff is trained on the ASI performance standard and has to comply with it.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the workers' rights in its code of conduct and expects the same of its suppliers. The Entity has one worker council.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of workers to collective bargaining, participate in any collective bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for workers, one worker council exist in the Entity.
10.2a Child Labour (minimum age)	Conformance	No child labour is used by the Entity. Young workers (from the age of 16 to 18) are under special protection.
10.2b Child Labour (hazardous)	Conformance	No child labour (under 16 years old) is used by the Entity. Young workers (from the age of 16 to 18) are under special protection. They are not allowed to work in hazardous working environment.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	No child labour (under 16 years old) is used by the Entity. Young workers (from the age of 16 to 18) are under special protection. The Entity commits itself and expects its suppliers to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established ASI performance standard manual, commits itself and expects its suppliers to comply with the prohibition of forced labour, slavery and human trafficking. No type of forced labor is found in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in forced labour. All employees are employed directly, no deposits, fees, or advances required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in forced labour. Workers are all local citizens.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in forced labour. No deposits or security payments are permitted.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in forced labour. There is no restriction of workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in forced labour. The Entity does not hold any original document, passport or permit, only copies of ID in the personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in forced labour. The time for announced termination of the working contract is regulated in the labor contract.
10.4 Non-Discrimination	Minor Non-Conformance	The Entity has established policy/procedure on anti-discrimination for the hiring, promoting, training processes and etc. But during the implementation process of these policies/procedures, the Entity does not check all the orientation health check and medical reports to ensure no discrimination based on medical test has occurred.
10.5 Communication and engagement	Conformance	The Entity encourage workers to participant in the ASI management system, direct and frequent communication with workers and the representatives of the worker councils is established. Positive working climate and direct communication were mentioned by interviewed persons.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	As per the ASI performance standard manual, the facility does not tolerate any form of punishment and harassment. It requires its suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. All the disciplinary records are needed to be confirmed by workers and management.
10.7a Remuneration (living wage)	Conformance	The wage is in compliance with legal standard, and meets the basic needs of workers.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted at the end of the month to the employees' bank accounts.
10.8 Working Time	Minor Non-Conformance	<p>Working hours are recorded electronically. But for Changde Site, the monthly overtime exceeds 36 hours, the weekly working hours exceed 60 hours sometimes. For Changsha Site, the monthly overtime exceeds 36 hours occasionally.</p> <p>However, annual leave provided to workers is only based on the working time in their facility, and does not consider the accumulative working time of workers' whole career as required.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established formal policies for OHS and posted in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has adequate and effective policies and procedures to ensure all workers and visitors follow internal OHS rules, including orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established formal policies for OHS including legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established formal policies for OHS including right to stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has established adequate procedures on OHS control, however, the management on confined spaces, occupational disease control, building certificates and emergency facilities is not adequate.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has adequate and effective mechanisms to collect workers' feedback on OHS. The mechanisms include suggestion boxes, worker representative meeting and irregular worker interview, accident/injury analysis. Related records are kept well since the founding.
11.4 OH&S performance	Conformance	The Entity has targets for accident/injury on OHS and the targets are reviewed quarterly.