

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# XIAMEN XIASHUN ALUMINIUM FOIL CO., LTD.

CERTIFICATE  
NUMBER

33

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

17 JULY 2019

DATE OF EXPIRY

16 JULY 2022

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

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](http://www.aluminium-stewardship.org)**

CERTIFICATION SCOPE

Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing.

Xiashun has three production facilities, located at Headquarters: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, Sheet Plant: No. 8 Dingshan Road, Haicang District, Xiamen 361026, P.R. of China, Haicang Foil Plant: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China and Huli Foil Plant: No. 65 & 67 Xinglong Road, Huli District, Xiamen 361006, P.R. of China.

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# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

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## OVERVIEW

MEMBER NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
ENTITY NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
CERTIFICATION SCOPE	<p>Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing. Xiashun has three production facilities, located at Headquarters : No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, Sheet Plant: No. 8 Dingshan Road, Haicang District, Xiamen 361026, P.R. of China, Haicang Foil Plant: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China and Huli Foil Plant: No. 65 &amp; 67 Xinglong Road, Huli District, Xiamen 361006, P.R. of China.</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>● Aluminium Re-melting / Refining</li><li>● Casthouses</li><li>● Semi-fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>● Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>● Certification Audit</li></ul>
AUDIT FIRM	DNV GL
AUDIT DATE	24 – 26 April 2019
AUDIT REPORT SUBMISSION	20 May 2019
AUDIT SCOPE	<p>Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing, at the Haicang Foil Plant, Head Office, Huli Plant, and the Sheet Plant.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>● Aluminium Re-melting / Refining</li><li>● Casthouses</li><li>● Semi-fabrication</li></ul>

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

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AUDIT  
OUTCOME

- Certification
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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.
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CERTIFICATION  
PERIOD

17 July 2019 – 16 July 2022

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

16 July 2021

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CERTIFICATE  
NUMBER

33

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. has developed and implemented policies, systems, procedures and processes to conform to the legal compliance requirements in ASI Performance Standard. No fine and request for the corrective actions from the government agencies and other stakeholders. Xiamen Xiashun conducts the compliance evaluation on an annual basis. However, one minor non-conformance is raised on legal compliance evaluation on labour & ethics.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are well implemented and trained. The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. The Entity investigated the one case that was reported; no evidence to substantiate the claim was found. Till now, there have been no cases of misconduct.
1.3 Code of Conduct	Conformance	A Code of Conduct which covers social and governance principles is established. The policies and the associated management procedures against ISO 14001 and OHSAS 18001 cover the implementation of management requirements on environment and occupational health and safety. The Code of Conduct is available for all interested stakeholders on the official website of the Entity: <a href="http://www.xiashun.com/envpubfile/ASI8.pdf">http://www.xiashun.com/envpubfile/ASI8.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Management Policies are consistent with the environmental, social, and governance practices, and published on the Entity's office website: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a> .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented policies, endorsement and support to provide sufficient resources for regular review of policies, meeting ASI Performance Standard requirements.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, publishing on website and posts on-site. More detailed information, please see: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a> .
2.2 Leadership	Conformance	A Senior Management representative has been nominated. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The Certification Scope is Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers all 3 locations.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems is established and implemented.
2.4 Responsible Sourcing	Conformance	The Purchasing Policy is communicated to all suppliers and contractors and cover the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. The responsible purchasing policy, please see: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a> .
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are well implemented at various departments. The identified risks on social, environment, OH&S and governance are assessed, and the associated control measures are established and implemented. There has not been any new projects or major changes since the Entity became a member.
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected stakeholders' groups, the Emergency Response Plans are established, well implemented and trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since the ASI management system started to operate in 2018.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for Closure, Decommissioning and Divestment is established in accordance to the requirement of ASI Performance Standard. But no such case has happened since the ASI management system started to operate in 2018.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability Report is published on the official website of the Entity: <a href="http://www.xiashun.com/envpubfile/ASI4.pdf">http://www.xiashun.com/envpubfile/ASI4.pdf</a> .
3.2 Non-compliance and liabilities	Conformance	No non-compliance or liabilities were recorded in the Sustainability Report in 2018. Per the official websites of the relevant government agencies and (non-government organisations (NGOs), no such case was raised by the government agencies.
3.3a Payments to governments (legal and contractual)	Conformance	As per the financial audit report from a 3rd audit firm on April 20, 2018, the payments to government by the Entity are only those legally required; and there were no other payments.
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	Internal and external Whistle-blowing/Complaint/Grievance mechanism exist (e.g. whistle blower hotlines, mail address, suggestion box). <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a> .
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The environmental life cycle assessment for aluminium foil products is conducted and documented. However, life cycle impacts of aluminium sheet product are not evaluated, one minor non-conformance is raised on environmental life cycle assessment (LCA) report.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental life cycle Assessment report can be provided by external Communication if required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The environmental life cycle assessment report is published in the official website of Xiamen Xiashun Aluminium Foil Aluminium Foil Co., Ltd. <a href="http://www.xiashun.com/about/gongshi.htm">http://www.xiashun.com/about/gongshi.htm</a> ;

CRITERION	RATING	COMMENT
4.2 Product design	Conformance	Following the product development process, the environmental impacts are taken into consideration.
4.3a Aluminium Process Scrap (targets)	Conformance	The process scrap utilization rate is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Per the result of risk analysis, the process scrap in the site does not need separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. communicates with main customer to discuss how to improve the recycling rate of products at end-of-life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Because there is not the complete local, regional or national collection and recycling systems for aluminium scraps in China, Xiamen Xiashun Aluminium Foil Co., Ltd. is working with the customer to decide how to improve the recycling rate of products at end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The major Scopes 1, 2 greenhouse gas emissions and energy use by source are tracked, calculated and documented annually. GHG emissions in 2018 are published on <a href="http://www.xiashun.com/envpubfile/ASI3.pdf">http://www.xiashun.com/envpubfile/ASI3.pdf</a> . The GHG emissions are not checked by a 3rd party.
5.2 GHG emissions reductions	Conformance	The site set up a GHG emission target in the next 5 years compared with the emission in 2018: over the next 5 years, greenhouse gas emissions per ton of aluminium belt products will be reduced by 2%, and greenhouse gas emissions per ton of aluminium foil products will be reduced by 3%. The main strategy is to reduce the unnecessary electricity consumption. GHG emissions target is published on <a href="http://www.xiashun.com/envpubfile/ASI7.pdf">http://www.xiashun.com/envpubfile/ASI7.pdf</a> .
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.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The waste air generated in the operation is collected and treated before discharge. The emission meets the local discharge limit.
6.2 Discharges to Water	Conformance	Discharges to water is covered and managed within the Environmental management system. Water discharge meets the local legal limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where Spills and Leakage may contaminate air, water and soil is done by following the risk assessment process of environmental management system.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and Management of Spills and Leakage is defined in the environmental management system. Major spills and leakages will be handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spill/Leakage is defined in Management Procedure of Information Disclosure. No spill/leakage happened in 2017 & 2018. Detailed information is published on <a href="http://www.xiashun.com/envpubfile/dfbdc2.pdf">http://www.xiashun.com/envpubfile/dfbdc2.pdf</a> , <a href="http://www.xiashun.com/envpubfile/hclbc2.pdf">http://www.xiashun.com/envpubfile/hclbc2.pdf</a> and <a href="http://www.xiashun.com/envpubfile/hllbc2.pdf">http://www.xiashun.com/envpubfile/hllbc2.pdf</a> .
6.4b Reporting of Spills (regular reporting)	Conformance	Reporting of Spill/Leakage is defined in Management Procedure of Information Disclosure. No spill/leakage happened in 2017 & 2018. Detailed information is published on <a href="http://www.xiashun.com/envpubfile/dfbdc2.pdf">http://www.xiashun.com/envpubfile/dfbdc2.pdf</a> , <a href="http://www.xiashun.com/envpubfile/hclbc2.pdf">http://www.xiashun.com/envpubfile/hclbc2.pdf</a> and <a href="http://www.xiashun.com/envpubfile/hllbc2.pdf">http://www.xiashun.com/envpubfile/hllbc2.pdf</a> .
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system. Xiamen Xiashun Aluminium Foil Co., Ltd. implemented a waste management strategy according to the waste mitigation hierarchy. The disposal of hazardous waste is compliance with the legal compliance.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity is registered in the Solid Waste Information management system and published on



CRITERION	RATING	COMMENT
		<a href="http://www.xiashun.com/envpubfile/hclbc1.pdf">http://www.xiashun.com/envpubfile/hclbc1.pdf</a> .
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.
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 Aluminium taken from the dross pressing will be recycled into the melting furnaces of Xiamen Xiashun Aluminium Foil. The rest part is sold to the outside dross processors for further extracting the Aluminium remained, which can be used to produce Aluminium alloying ingots and construction materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the dross pressing will be recycled into the melting furnaces of Xiamen Xiashun Aluminium Foil. The rest part is sold to the outside dross processors for further extracting the Aluminium remained, which can be used to produce Aluminium alloying ingots and construction materials.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	The company reviews the internal dross processing method and dross sales channel on yearly basis. Nothing is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are assessed. The level of water-related risk is low.
7.2a Water management (management plans)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Water-related risks assessment report is published on <a href="http://www.xiashun.com/envpubfile/ASI6.pdf">http://www.xiashun.com/envpubfile/ASI6.pdf</a> .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System, Xiamen Xiashun Aluminium Foil Co., Ltd. is not within or close to any protected area, therefore the risk or impact by the operation of Xiamen Xiashun Aluminium Foil Co., Ltd. on biodiversity is very low. Further information, please see <a href="http://www.xiashun.com/envpubfile/ASI5.pdf">http://www.xiashun.com/envpubfile/ASI5.pdf</a> .
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.3 Alien Species	Conformance	The main carrier medium (pallets which is wood) is processed in a way to avoid the introduction of alien species.

CRITERION	RATING	COMMENT
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.
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 company Human Rights and Business Ethics Policy commitment is set up, and communicated to all employees. Further information, please see: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a>
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. commits to respect Human Right and tries to extend this commitment in the supply chain. The due diligence process is established covering the supply chain. However, contractors providing security services to Xiamen Xiashun Aluminium Foil Co., Ltd. are affected parties, and not enrolled in the Human Rights due diligence process.
9.1c Human Rights Due Diligence (remediation)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. establishes and publishes the complaints/grievance channel to stakeholders. No adverse impact is reported, no remedy is needed.
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.
9.3 Indigenous Peoples	Not Applicable	There are not Indigenous Peoples in the Certification Scope of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are not Indigenous Peoples in the Certification Scope of the Entity.
9.5 Cultural and sacred heritage	Not Applicable	There is not sacred or cultural heritage sites and values within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable as there is no resettlement necessary in the site's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable as there is no resettlement necessary in the site's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The Entity makes a commitment to respect the rights and interests of local communities. No complaints from local communities were received.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaints from local communities were received.
9.7c Local Communities (livelihoods)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. employs people from local communities, and prevents adverse impacts to their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The site makes a commitment to not using conflict minerals and communicates this through the aluminium value chain. Further information, please see: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a> .
9.9 Security practice	Conformance	The Entity implemented security practices that respect Human Rights.
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. There are 105 elected worker representatives and the trade union is established in accordance to the legal requirement.
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 has a collective bargaining agreement for wages in 2018-2020 covering all employees. The employee representative meeting approved the agreement, and this was also reviewed and registered with the associated government agency.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives can deal with the workers' concerns with management on behalf of workers.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Conformance	There is no child labour or young workers in the Entity.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in China. Young workers are (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. There is no child labour or young workers in the Entity currently.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in China. Xiamen Xiashun Aluminium Foils Co., Ltd. commits itself - and expects its suppliers - to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in forced labour. All employees are hired directly. Workers are not required any form of deposit; recruitment fee or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign migrant workers in Xiamen Xiashun Aluminium Foil Co., Ltd., all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in forced labour, and does not provide any type of loan to workers.
10.3e Forced Labour (freedom of movement)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in forced labour. There is no restriction of workers' movement at site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in forced labour. There is no retention of original documents of workers, only copies of original documents are kept in workers' personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The workers in the Entity can terminate the 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: 30 days in advance or 3 days in the period of probation.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is committed to non-discrimination. No case of discrimination is received.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the workers and the worker representatives is established.
10.6 Disciplinary practices	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of worker involved.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, the basic wage is above the legal minimum wage. The total payment meets the workers' basic needs; all workers are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all workers by bank transfer at the end of the following month.
10.8 Working Time	Conformance	The working hours are recorded by proximity card. Working hours are monitored and are in compliance with Chinese Labour Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is OHSAS18001:2007 certified. The Occupational Health and Safety Policy is implemented, reviewed periodically and communicated with stakeholders. <a href="http://www.xiashun.com/about/milestones.htm">http://www.xiashun.com/about/milestones.htm</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The health & safety policy is applied to workers and visitors in compliance with the legal requirements and the requirements of OHSAS 18001:2007.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The health & safety policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Worker are provided the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them and right to refuse the unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has implemented a documented OHSAS 18001:2007 management system and holds a valid OHSAS 18001:2007 Certificate. The Certification Scope is Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers all 3 locations.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirements and OH&S management system requirements, the Entity has a system of workers' consultation and participation in health & safety. The management responds to the concerns and advices on OH&S issues from workers.
11.4 OH&S performance	Conformance	Health and Safety targets and improvements are documented in the Occupational Health and Safety Program. Further information, please see: <a href="http://www.xiashun.com/about/gongshi.htm">http://www.xiashun.com/about/gongshi.htm</a> .