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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**JIANGSU ZHONGJI  
LAMINATION  
MATERIALS CO.,  
LTD**

CERTIFICATE  
NUMBER

37

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

5 AUGUST 2019

DATE OF EXPIRY

4 AUGUST 2022

CERTIFIED SINCE

5 AUGUST 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

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CERTIFICATION SCOPE

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiayangin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

*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)

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd.
ENTITY NAME	Jiangsu Zhongji Lamination Materials Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Material Conversion</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	12 – 13 June 2019
AUDIT REPORT SUBMISSION	23 June 2019
AUDIT SCOPE	<p>Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Material Conversion</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>

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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

5 August 2019 – 4 August 2022

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

4 August 2021

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CERTIFICATE  
NUMBER

37

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Jiangsu Zhongji Lamination Materials Co., Ltd. has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Jiangsu Zhongji Lamination Materials Co., Ltd. has systems in place to maintain awareness of and to ensure compliance with applicable law.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are well implemented and trained.
1.3 Code of Conduct	Conformance	Jiangsu Zhongji Lamination Materials Co., Ltd. has implemented a Code of Conduct including principles related to environmental, social and governance performance. Jiangsu Zhongji Lamination Materials Co., Ltd. implemented adequate measures, including training, communication to raise awareness of the code among business partners and suppliers. More information can be found via the link below: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030638.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030638.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. For further details, please see: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, publishing on the website and by post on-site. More information can be found via the link below: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf</a>
2.2 Leadership	Conformance	A Senior Management representative has been nominated.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	Jiangsu Zhongji Lamination Materials Co., Ltd. has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The scope of the external certifications covers the Entity's ASI Certification Scope.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems has been established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party due diligence audits at major next tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. More information can be found via the link below: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf</a>
2.5 Impact Assessments	Not Applicable	No new projects or major changes have been made since the Entity became an ASI member.
2.6 Emergency Response Plan	Minor Non-Conformance	Emergency Response Plans on social, occupational health and safety, (OH&S) and environmental accidents are well implemented and trained. However, the emergency plan for confined space entry is not prepared. Also, it was noted that office staff didn't attend the factory fire drill in 2018.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since the Entity started the operation at the location in 2018.
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 Entity started operation in 2004.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability report is published on the website of Jiangsu Zhongji Lamination Materials Co., Ltd. More information can be found via the link below:

CRITERION	RATING	COMMENT
		<a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf</a>
3.2 Non-compliance and liabilities	Conformance	No non-compliance or liabilities in 2018.
3.3a Payments to governments (legal and contractual)	Conformance	Per the financial audit report as verified by a third party audit firm in 2018, the payments to government by the Entity are only those that are legally required. No other payments are made.
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 exists (e.g. whistle blower hotlines, mail address, suggestion box). <a href="http://www.zjalufoil.com/contact/">http://www.zjalufoil.com/contact/</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Environmental Life Cycle Assessment is conducted and documented.
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 Jiangsu Zhongji Lamination Materials Co., Ltd. More information can be found via the link below: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190613091750.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190613091750.pdf</a>
4.2 Product design	Conformance	Following the product development process, 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 generated by the Entity does not need separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a recycling strategy with timelines, activities and targets. The Entity has a recycling strategy with timelines, activities and targets. The production scrap is 100% recycling

CRITERION	RATING	COMMENT
		reuse. Jiangsu Zhongji Lamination Materials Co., Ltd. is communicating with main customers 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 are no local, regional or national collection and recycling systems for aluminium scraps in China, Jiangsu Zhongji Lamination Materials 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	Minor Non-Conformance	Greenhouse Gases (GHG) emissions are publicly disclosed in GHG emission report in 2018 which is published on the official company website: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030030.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030030.pdf</a> . The GHG emission is not checked by a 3rd party. One minor non-conformity was raised because the Scope 3 emissions were not included in the report as required by the Entity's procedures.
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emission target: to reduce the GHG emission at a level below 0.699 tons CO <sub>2</sub> -eq per metric ton Aluminium foil in 2019. The main strategy is to improve the energy-consumption efficiency. More information, please see: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190612010008.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190612010008.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.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has plans to minimise adverse impacts from air emissions. The waste air generated in the operation is collected and treated before emission. The emission meets the local emission limit.

CRITERION	RATING	COMMENT
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	Based on the result of risks identification and assessment of spill/leakage, the emergency preparedness and response plan for the leakage of chemicals is established, and includes processes for external communication plans and methods to prevent spills and leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spill/Leakage is defined in the Emergency Response Plan. The procedure to disclose significant spill to all affected parties (such as local community, neighbours, etc.) is covered in the emergency response plan. There have not been any significant spills to report since the Entity started the operation at the existing location.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spill/leakage and remediation actions taken are published in the annual sustainability report. No spill/leakage happened in the past 3 years. <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190724052555.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190724052555.pdf</a> , page 5.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system and has been designed in accordance with the Waste Mitigation Hierarchy. The management procedure of hazardous and non-hazardous waste is established and implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The nature and quantity of Hazardous Waste generated by the Entity is registered in the Solid Waste Information management system: <a href="http://218.94.78.90:8080">http://218.94.78.90:8080</a> , and this information and how to manage the non-hazardous waste includes the associated waste disposal methods is published in the sustainability report on the website <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf</a> , page 7.



CRITERION	RATING	COMMENT
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)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The water-related risk assessment is conducted covering its own operation and its Area of Influence. The water source is municipal water supply. Usage is tracked and documented.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are assessed. For more information, please see: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030857.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030857.pdf</a> .

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	The water-related risks were identified and assessed as low risks to the Entity.
7.2b Water management (monitoring)	Not Applicable	The water-related risks were identified and assessed as low risks to the Entity.
7.3 Disclosure of water usage and risks	Conformance	The Water-related risks assessment report and Water Balance Map are published on <a href="http://www.zjalufoil.com/download/baogaogongs/hi/index.html#middle">http://www.zjalufoil.com/download/baogaogongs/hi/index.html#middle</a> .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A biodiversity impact assessment to for the Entity's activities and within its Area of Influence was conducted by a qualified third party and included in the Environmental Management System. The report showed that there were no significant risk and impacts on biodiversity due to the nature of products and the production, and that the Entity is not located or close to any protected areas. The biodiversity risk report is published on <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190613104614.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190613104614.pdf</a> .
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.
8.2c Biodiversity management (reporting)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.
8.3 Alien Species	Conformance	The main carrier medium (pallets made of wood) is processed in a way to avoid the introduction of alien species.
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 Policy commitment is set up, and communicated to all employees.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd commits to respect Human Rights. The due diligence process is established covering the supply chain. However, one Minor Non-Conformance is issued on due diligence of major suppliers. Sampled time records of 2 randomly selected security workers from on-site service provider show their monthly overtime hours exceed legal limit.
9.1c Human Rights Due Diligence (remediation)	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd establishes and publishes the complain/grievance channel to stakeholders. A remediation process towards any adverse human rights impact is in place. No major impacts are reported.
9.2 Women's Rights	Conformance	Women's legal 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	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) are established. However, there are no Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Policies and procedures to protect cultural and sacred heritage are established. However, there are no sites of cultural or sacred heritage.
9.5 Cultural and sacred heritage	Not Applicable	Polices and procedures to protect cultural and sacred heritage are established. However, there are no sites of cultural or sacred heritage.
9.6a Resettlements (avoid or minimise)	Not Applicable	Jiangsu Zhongji Lamination Materials Stock Co., Ltd has established a procedure on resettlement. However, no resettlement or displacement has been conducted by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	Jiangsu Zhongji Lamination Materials Stock Co., Ltd has established procedure on resettlements.

CRITERION	RATING	COMMENT
		However, no resettlement or displacement has been conducted by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaints from the local communities have been received.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaints from the local communities have been received.
9.7c Local Communities (livelihoods)	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd has a close relationship with local communities. More than half of its employees are from the local community. The Entity provides donations to local communities as well.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not using conflict minerals, and communicates this through the aluminium value chain.
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect Human Rights in line with ASI standards and good practice.
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 demonstrates they respect the right to Freedom of Association and to Collective Bargaining. The Entity commits itself to respect the workers' rights. There are 60 elected worker representatives including 11 women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. Although there are no collective bargaining agreements in the company, the Entity has a policy of respecting rights to freedom of association and collective bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws that restrict Freedom of Association and Collective Bargaining in China. However, the Entity demonstrates they respect the right to freedom of association and to collective bargaining. Workers' representatives can deal with 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 working 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.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in China. Jiangsu Zhongji Lamination Materials Stock Co., Ltds commits itself - and expects its suppliers - to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	Jiangsu Zhongji Lamination Materials Stock 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	Jiangsu Zhongji Lamination Materials Stock 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 Jiangsu Zhongji Lamination Materials Stock Co., Ltd, all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd is not involved in forced labour and does not provide a loan to workers.
10.3e Forced Labour (freedom of movement)	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd is not involved in forced labour. There is no restriction of workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Jiangsu Zhongji Lamination Materials Stock 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	Jiangsu Zhongji Lamination Materials Stock Co., Ltd is not involved in forced labour. The time for announced termination of the employment is in compliance with the Labor Contract Law: 30 days in advance or 3 days in the period of probation.
10.4 Non-Discrimination	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd is committed to non-discrimination. No case of discrimination has been received.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	Direct and frequent communication with the workers and worker representatives is established.
10.6 Disciplinary practices	Conformance	Jiangsu Zhongji Lamination Materials Stock Co., Ltd respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of the involved worker.
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 need.
10.7b Remuneration (method of payment)	Minor Non-Conformance	All payments are documented and timely paid to all workers by bank transfer on the 15th of the following month. However, one Minor Non-Conformance is issued on not issuing pay slips to workers.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded manually. Working hours are monitored and are in compliance with China Labor Law. However, a minor non-conformance was issued for two occurrences of worker hour related exceedance. One relates to the Minor Non-Conformance raised in criterion 9.1b regarding contract security workers. The other was a non-conformance against Applicable Law relating to overtime hours for working mothers with children under 1 years old.

#### PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Occupational Health and Safety Policy is implemented, reviewed periodically and communicated with stakeholders. <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf</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.

CRITERION	RATING	COMMENT
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.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented OHSAS 18001:2007 Management system and holds a valid OHSAS 18001:2007 Certificate. However, one worker diagnosed with occupational noise exposure issues was not transferred to a non-noise position in a timely manner as required by Applicable Law. Also, not all monitoring files for workers exposed to occupational disease hazards have been established as required by Applicable Law.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirement and OH&S management system requirement, the Entity has a system of workers' consultation and participation in health & safety. Worker representatives participate in the health and safety meeting periodically, the management responds to the concerns and advice on OH&S issues from workers.
11.4 OH&S performance	Conformance	Health and Safety Targets and improvements are documented in Occupational Health and Safety Program. For further information, please see: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.pdf</a> .