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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**SHANDONG  
NANSHAN  
ALUMINIUM**

CERTIFICATE  
NUMBER

17

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

29 JANUARY 2019

DATE OF EXPIRY

28 JANUARY 2022

CERTIFIED SINCE

29 JANUARY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', 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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Yantai Donghai Aluminium Foil Co., Ltd. is located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China which carries out the manufacture and sale of high-precision aluminium and aluminium alloy foils.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME Shandong Nanshan Aluminium Co. Ltd.

ENTITY NAME Yantai Donghai Aluminium Foil Co., Ltd.

CERTIFICATION SCOPE Yantai Donghai Aluminium Foil Co., Ltd. is located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China which carries out the manufacture and sale of high-precision aluminium and aluminium alloy foils.

SUPPLY CHAIN ACTIVITIES

- Material Conversion (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Certification Audit

AUDIT FIRM DNV GL

AUDIT DATE 24 –28 December 2018

AUDIT REPORT SUBMISSION 17 January 2019

AUDIT SCOPE The audit scope covered the Yantai Donghai Aluminium Foil Co., Ltd. is a subsidiary of Shandong Nanshan Aluminium Co. Ltd. and located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China. The main products cover high-precision aluminium and aluminium alloy foils.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

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

29 January 2019 – 28 January 2022

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

29 July 2020

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CERTIFICATE  
NUMBER

17

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Donghai Aluminium Foil collects and identifies the applicable legal requirements and other requirements, conducts the compliance evaluation on an annual basis. No fine and request for the corrective actions issued from the government agencies and other stakeholders.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are well implemented and trained.
1.3 Code of Conduct	Conformance	A Code of Conduct which covers environmental, social and governance principles is available for all stakeholders on the Homepage of the site's father company: Nanshan Light Alloy Co., Ltd.: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</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. The detailed information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</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 website and displayed on-site <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
2.2 Leadership	Conformance	A Senior Management representative has been nominated.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Donghai Aluminium Foil has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems established and implemented.
2.4 Responsible Sourcing	Conformance	The Purchasing Policy is communicated to all suppliers and contractors and cover the material

CRITERION	RATING	COMMENT
		environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. The policy is published in the website of Nanshan Light Alloy Co., Ltd.: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are well implemented at various departments.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans are well implemented and workers trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since the site started the operation in 2002.
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 Donghai Aluminium Foil started operation in 2002.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability report, published on the website of Nanshan Light Alloy Co., Ltd. <a href="http://www.nanshanqhj.com/newsdetails?id=492&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=492&amp;cid=235</a>
3.2 Non-compliance and liabilities	Conformance	No non-compliance or liabilities were recorded in annual report 2017. Per the official websites of the relevant government agencies and NGOs, no such case was raised by the government agencies.
3.3a Payments to governments (legal and contractual)	Conformance	The payment to government is listed in the finance report which is audited by the 3rd party.
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).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The environmental life cycle assessment is conducted and documented.

CRITERION	RATING	COMMENT
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 information of LCA is published in the website of Nanshan Light Alloy Co., Ltd., the father company of Donghai Aluminium Foil. Further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=491&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=491&amp;cid=235</a>
4.2 Product design	Minor Non-Conformance	Following the R&D procedure, the environmental impacts are taken into consideration. One minor non-conformance: no target for energy-consumption reduction.
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	Donghai Aluminium Foil has a clear recycling strategy, working with customer to improve the recycling rate 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, Donghai Aluminium Foil is working with the customer to decide how to achieve the target.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	GHG emissions are publicly disclosed in the annual report which is published in website of Nanshan Light Alloy Co., Ltd., the father company of Donghai Aluminium Foil.: <a href="http://www.nanshanqhj.com/newsdetails?id=496&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=496&amp;cid=235</a> The GHG emission is not checked by 3rd party. One minor non-conformity is raised: wrong definition of some emission sources, e.g. CO <sub>2</sub> fire extinguishers is wrongly defined as Scope 3.
5.2 GHG emissions reductions	Conformance	The site set up a GHG emission target: to reduce the GHG emission at a level below 1.4 tons CO <sub>2</sub> -eq per metric ton Aluminium foil in the future 5 years. The main strategy is to improve

CRITERION	RATING	COMMENT
		the electricity-consumption efficiency, using the green electricity. For further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=496&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=496&amp;cid=235</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 waste air generated in the operation is collected and treated before discharge. The emission meets the local emission 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 the Emergency Response Plan.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spill/leakage and remediation actions taken will be published in the annual sustainability report. No spill/leakage happened in 2017 and 2018.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system. The reduction targets according the collection of hazardous and non-hazardous waste are established, how to achieve the target is defined and implemented.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the site is registered in the Solid Waste Information management system, and the reduction percentage of landfill is published in the Sustainability report on the website of the father company: Nanshan Light Alloy Co., Ltd.: <a href="http://www.nanshanqhj.com/newsdetails?id=492&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=492&amp;cid=235</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)	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.



CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are assessed.
7.2a Water management (management plans)	Conformance	The targets of water-consumption reduction are set up for the future 3 years.
7.2b Water management (monitoring)	Conformance	Water consumption is monitored. The achievement status of the related targets is assessed.
7.3 Disclosure of water usage and risks	Conformance	The Water-related risks assessment report and target of water-consumption reduction is published on <a href="http://www.nanshanqhj.com">www.nanshanqhj.com</a> .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System, Donghai Aluminium Foil is not in or close to any protected area.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	Per the result of the risk assessment on biodiversity, there is not any significant risk or impact by the operation of Donghai Aluminium Foil.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The risk or impact by the operation of Donghai Aluminium Foil on biodiversity is very low.
8.2c Biodiversity management (reporting)	Not Applicable	The risk or impact by the operation of Donghai Aluminium Foil on biodiversity is very low.
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.
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.

CRITERION	RATING	COMMENT
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. The further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
9.1b Human Rights Due Diligence (process)	Conformance	Donghai Aluminium Foil commits to respect Human Rights. The due diligence process is established covering the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	Donghai Aluminium Foil establishes and publishes the complain/grievance channel to stakeholders. No Major impact is reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. No complaint is received on from women workers.
9.3 Indigenous Peoples	Not Applicable	This criterion is not applicable as there are no indigenous people in the site's Certification Scope
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion is not applicable as there are no indigenous people in the site's Certification Scope
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as no cultural and sacred heritage is affected by the site.
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	Donghai Aluminium Foil has close relationship with local communities. Stakeholders with their interests were identified and mapped.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaint from the local communities is received.
9.7c Local Communities (livelihoods)	Conformance	Donghai Aluminium has a close relationship with local communities. Most half of its employees are from the local communities; The father

CRITERION	RATING	COMMENT
		company of Donghai supports several social initiatives of the local communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The site makes a commitment not using conflict minerals, and communicate it through the aluminium value chain.
9.9 Security practice	Not Applicable	Not applicable, as plant security is provided through the company's own staffs.
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. The Entity commits itself to respect the workers' rights on the basis of following legal requirements. The workers elect six workers including one woman as their representatives. The workers representatives interact with the management on the OH&S issues, wellbeing and the issues on employment in accordance to the legal requirements. For further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. The company respects the rights of Workers to collective bargaining. There is a Policy of respecting rights to freedom of association and collective bargain. No collective bargaining agreements in the company.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives can deal with the workers' concerns with management on behave of workers.
10.2a Child Labour (minimum age)	Conformance	There is not child labor or young worker in the company.
10.2b Child Labour (hazardous)	Conformance	Child labor 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. Donghai Aluminium Foils commits itself - and expects its suppliers - to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	Donghai Aluminium Foil commits itself - and expects its suppliers - to comply with the

CRITERION	RATING	COMMENT
		prohibition of forced labor, slavery and human trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Donghai Aluminium Foil 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)	Not Applicable	There is not foreign migrant worker in Donghai Aluminium Foil, all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	Donghai Aluminium Foil is not involved in forced labour, does not provide loan to workers.
10.3e Forced Labour (freedom of movement)	Conformance	Donghai Aluminium Foil is not involved in forced labor. There is no restriction of workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Donghai Aluminium Foil 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)	Minor Non-Conformance	Donghai Aluminium Foil is not involved in forced labour. The notice period 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. However, some workers eligible for labour contract without fixed term were still on labour contracts with fixed term.
10.4 Non-Discrimination	Conformance	Donghai Aluminium Foil 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	Donghai Aluminium Foil respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of involved worker.
10.7a Remuneration (living wage)	Minor Non-Conformance	The wage structure is clearly defined, the basic wage is above the legal minimum wage. The total payment meets the workers' basic need. However, not all workers had enrolled in the mandatory social insurance scheme.

CRITERION	RATING	COMMENT
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	Working hours are recorded manually. Working hours are monitored and are in compliance with China Labor Law.
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. Further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</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. Further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
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. Further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
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. Further information, please see: <a href="http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235">http://www.nanshanqhj.com/newsdetails?id=490&amp;cid=235</a>
11.2 OH&S Management System	Conformance	The site has implemented and documented OHSAS 18001:2007 Management system and holds a valid OHSAS 18001:2007 Certificate.
11.3 Employee engagement on health and safety	Conformance	The has a system of workers' consultation and participation in health & safety. Worker representatives participate at the monthly health and safety meeting periodically, the management responds the concerns and advices on OH&S issues from workers.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	Health and Safety Targets and improvements are documented in Occupational Health and Safety Program.

**Document Control and Version History**

Revision	Date	Notes
0	29 January 2019	Issued
1	2 March 2019	Comments section updated by audit firm and addition of links to public information
2	28 August 2019	Updated links