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**ASI CERTIFICATION  
PERFORMANCE  
STANDARD**



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PRESENTED TO

**LOTTE ALUMINIUM  
CO., LTD. ANSAN  
PLANT**

CERTIFICATE  
NUMBER

75

ASI  
STANDARD

**PERFORMANCE  
STANDARD  
(V2 2017)**

CERTIFICATION  
LEVEL

**FULL  
CERTIFICATION**

ASI  
ACCREDITED  
AUDITOR

**DNV GL**

DATE OF ISSUE

**18 FEBRUARY 2020**

DATE OF EXPIRY

**17 FEBRUARY 2023**

CERTIFIED SINCE

**18 FEBRUARY 2020**

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John', written over a horizontal line.

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

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CERTIFICATION SCOPE

The Lotte Aluminium Plant in Ansan, South Korea is a manufacturer of rolled products of aluminium 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)**

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# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

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## OVERVIEW

MEMBER NAME	Lotte Aluminium Co., Ltd
ENTITY NAME	Lotte Aluminium Co., Ltd. Ansan Plant
CERTIFICATION SCOPE	The Lotte Aluminium Plant in Ansan, South Korea is a manufacturer of rolled products of aluminium foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</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>First Certification Audit</li></ul>
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none"><li>13 January 2020 . 15 January 2020 (First Certification Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>1 February 2020 (First Certification Audit)</li></ul>
AUDIT SCOPE	<p>Lotte Aluminium Plant in Ansan, South Korea is a manufacturer of rolled products of aluminium foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</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

18 February 2020 - 17 February 2023

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NEXT AUDIT  
TYPE

Surveillance audit

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NEXT AUDIT  
DUE DATE

17 August 2021

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CERTIFICATE  
NUMBER

75

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to requirements in ASI Performance Standard on legal compliance. The Entity has systems in place to maintain awareness of and to ensure compliance with applicable law.</p> <p>The information on legal compliance is on page 12 of Sustainability Report:  <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a>.</p>
1.2 Anti-Corruption	Conformance	<p>Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent corruption are implemented and personnel trained in these processes as verified through training records. The entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. The Entity also has a Policy for Labour and Business Ethics which is published on  <a href="https://www.lotteal.co.kr/manage/ethicsManageethics.asp">https://www.lotteal.co.kr/manage/ethicsManageethics.asp</a>.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity implemented adequate measures, including training, communication to raise awareness of the code among business partners and suppliers. The Code of Conduct is available for all interested stakeholders on the official website of the Entity:  <a href="https://www.lotteal.co.kr/manage/ethicsManageethics.asp">https://www.lotteal.co.kr/manage/ethicsManageethics.asp</a>.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The management policies are consistent with the environmental, social, and governance practices. It is published on Page 10 of the Sustainability Report:  <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a>.</p>

CRITERION	RATING	COMMENT
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 available on-site. <a href="https://www.lotteal.co.kr/manage/ethicsManagement/ethics.asp">https://www.lotteal.co.kr/manage/ethicsManagement/ethics.asp</a> .
2.2 Leadership	Conformance	A Senior Management representative has been appointed. The overall responsibility and authority of the role is defined as to ensuring conformance with ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity 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 System has been established and implemented. Social and occupational health and safety impacts are identified and assessed, the associated management provisions for preventing and/or mitigating these impacts are established and implemented. The Entity is certified against OHSAS 18001:2007, holds a valid OHSAS 18001:2007 certificate.
2.4 Responsible Sourcing	Conformance	The Entity identifies the major next tier suppliers, conducts second party due diligence audits at major next tier suppliers sites, and requires suppliers to implement corrective actions upon the audit findings to improve the performance against the ASI PS standards. The procurement team and relevant personnel are trained on responsible sourcing requirements. The purchasing policies are published on the entity's website, the external stakeholders can access it at: Page 28 of Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
2.5 Impact Assessments	Conformance	The Entity establishes and implements the documented procedures to identify and assess the risks on social, environmental, OH&S and governance aspects, and establishes the

CRITERION	RATING	COMMENT
		<p>relevant control measures based on the ASI Performance Standard and associated legal requirements.</p> <p>A process is in place to screen developments, expansions, significant changes to operating facilities and in the case of new projects or major changes, to determine if there are environmental and/or social risks and impacts that require an impact assessment.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity establishes emergency response, Business Continuity &amp; Resumption Plan covering fire, hazardous chemical leak, breakdown of the environment protection facilities, extreme weather, black out, safety accidents, labour shortage, strike and the relevant resumption plan. The well-established emergency response plans are developed in collaboration with potentially affected stakeholder groups such as communities, workers and the labour union representatives. Based on the requirements of ISO 14001 &amp; OHSAS 18001, the site establishes the emergency response plan for EHS issues, communicates to the associated stakeholders which is compliance with the ISO standard requirements and legal requirements. The employees are provided the relevant training courses and the exercises are conducted for fire/evacuation, chemical leak.</p>
2.7 Mergers and Acquisitions	Conformance	<p>A procedure is established for mergers and acquisitions, but no such activity has happened since 2017.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>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 2010.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The annual Sustainability report, published on the Entity's official website is available at: <a href="https://www.lotteal.co.kr/download/지속가능보고서.pdf">https://www.lotteal.co.kr/download/지속가능보고서.pdf</a>.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity does not have any significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.</p>

CRITERION	RATING	COMMENT
		This information is reported on Page 14 of Sustainability Report: <a href="https://www.lotteal.co.kr/download/지속가능보고서.pdf">https://www.lotteal.co.kr/download/지속가능보고서.pdf</a> .
3.3a Payments to governments (legal and contractual)	Conformance	As per the finance report published in <a href="http://dart.fss.or.kr">http://dart.fss.or.kr</a> , the payments to government are legally required, such as tax, etc. on a legal and/or contractual basis. The annual finance report was audited by a 3rd party. The information of the annual finance report can be found in: <a href="http://dart.fss.or.kr">http://dart.fss.or.kr</a> .
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). The information can be found on Page 11 of the Sustainability Report: <a href="https://www.lotteal.co.kr/download/지속가능보고서.pdf">https://www.lotteal.co.kr/download/지속가능보고서.pdf</a> .
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The environmental life cycle assessment is conducted and documented. The Environmental Life Cycle Assessment Report is published on the website of the Entity: <a href="https://www.lotteal.co.kr/download/LCA분석자료.pptx">https://www.lotteal.co.kr/download/LCA분석자료.pptx</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided cradle-to-gate Life Cycle Assessment (LCA) information on its aluminium products. Because the production processes of all product are same, the assessment covers all products and all production processes. The Environmental Life Cycle Assessment report can be provided for the external Communication if required.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	How to communicate with customers or other interested parties is defined in accordance to the written communication procedure in Environment Management System. The Environmental Life Cycle Assessment Report is published in the official website of the Entity:

CRITERION	RATING	COMMENT
		<a href="https://www.lotteal.co.kr/down/LCA분석자료.ppt">https://www.lotteal.co.kr/down/LCA분석자료.ppt</a> X.
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end products. More information is available on Page 3 of the LCA report: <a href="https://www.lotteal.co.kr/down/LCA분석자료.ppt">https://www.lotteal.co.kr/down/LCA분석자료.ppt</a> X.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and 100% collects, subsequent recycling the process scraps. Solid Waste management is on page 34 of the Entity's Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Due to the nature of the products present at the Entity, alloy separation for aluminium process scrap is not required.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As per the nature of the products in the Entity, recycling material cannot be used in the production processes, and end products cannot be re-used. The Entity communicates this to its customers.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Per the nature of the products in the Entity, recycling material cannot be used in the production processes, and end products cannot be re-used. The Entity communicates this to its customers.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The major scope 1, 2 greenhouse gas emissions and energy use by source are tracked, calculated and documented annually. The information can be reached on Page 16 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> . The GHG emission report is verified by 3rd party.
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emission reduction target in 2019 based on the GHG emission level



CRITERION	RATING	COMMENT
		in 2018, aligning with the group target assigned. The associated management program is established and implemented. For section 1&2 of GHG emission reduction target, the information can be reached on Page 15 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.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 air from the tempering process is the major source, the scrubber is used for the treatment. The waste air is collected and treated before emission to mitigate adverse impacts. The monitoring reports shows 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. The entity has established water reduction targets: 2% reduction comparing to last year in 2019 and establish related plan to minimize adverse impacts.
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 undertaken via 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 are 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 occurred in 2018. The information can be found on Page 19 of the Sustainability Report:

CRITERION	RATING	COMMENT
		<a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spill/leakage and remediation actions taken has been published in the annual sustainability report. No spill/leakage has occurred in the last 3 years. The information can be found on Page 19 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
6.5a Waste management and reporting (strategy)	Conformance	The waste management is covered in the Environment Management System. The Entity implemented a waste management strategy according to the waste mitigation hierarchy. The hazardous waste is transferred and disposed of by the qualified supplier which is verified before signing the disposal agreement, the waste reduction target is set up to minimize the negative impact, The achievement status is monitored monthly.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposal information on page 34 of the sustainable development report in 2018 and published in the official website: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.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.

CRITERION	RATING	COMMENT
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 source is municipal water supply. Usage is tracked and documented. The declaration of Wastewater discharge is in place. The water consumption is not significant due to the nature of the product and production processes.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The Entity's operational, internal and external risk in their area of influence are taken into consideration in the water risk assessment. Due to the nature of the product and production processes and the existing water management systems, the water-related risk is low in the local water environment.
7.2a Water management (management plans)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified during the risk assessment.
7.2b Water management (monitoring)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified during the risk assessment.
7.3 Disclosure of water usage and risks	Conformance	The water usage and risks assessment report is published on Page 19 of the sustainability report in 2018, please see:

CRITERION	RATING	COMMENT
		<a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity risk assessment is conducted by the Entity. The biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low. Further information, please see Page 18 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified during the risk assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified during the risk assessment.
8.2c Biodiversity management (reporting)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified during the risk assessment.
8.3 Alien Species	Conformance	Per the biodiversity risk assessment report, the only source which could introduce the alien species is the wood pallets used for raw material/product package. All pallets are fumigated before using to prevent 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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The written Policy on Human Rights are established and expresses a commitment to respect human rights. The policy is

CRITERION	RATING	COMMENT
		communicated to all employees. The policy is available on Page 10 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
9.1b Human Rights Due Diligence (process)	Conformance	The Human Rights Due Diligence process is established to identify and assess the risks and impacts on Human Rights including the ones in the supply chain, local communities and indigenous people. As the result of assessment, for the supply chain, the overall risk level is low, there is no risk on human rights to the other stakeholders.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity establishes and publishes the complaint/grievance process to stakeholders. As per the risk assessment report and the risk assessment reports for major suppliers, no major risks or impact is reported.
9.2 Women's Rights	Conformance	The Entity commits to respect women's rights. The legal requirements on women's rights are collected and identified, and the associated control measures are established and implemented accordingly. No complaint/grievance on women's rights has been reported.
9.3 Indigenous Peoples	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.5 Cultural and sacred heritage	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.7a Local Communities (rights and interests)	Conformance	The policy on respecting the legal and customary rights and interests of local Communities is in place. The Entity conducts the risk assessment, takes the action accordingly.
9.7b Local Communities (impacts)	Conformance	The Entity conducts the risk assessment on local community's rights. Per the result of the

CRITERION	RATING	COMMENT
		risk assessment, the impact on the local communities by the Entity is limited due to its location in an industrial zone.
9.7c Local Communities (livelihoods)	Conformance	As per the result of risk assessment on local communities rights, the impact on the local communities by the Entity is limited. The Entity performs some charity activities to the local communities. The information can be found on Page 25-27 of the Sustainability Report: <a href="https://www.lotteal.co.kr/down/지속가능보고서.pdf">https://www.lotteal.co.kr/down/지속가능보고서.pdf</a> .
9.8 Conflict-Affected and High-Risk Areas	Conformance	The site conducts an analysis to determine if the conflict minerals are used in products or the production processes. The result is no conflict minerals are used, and no materials are from the Conflict-Affected and High-Risk Areas. The site makes a commitment to all customers and suppliers: prohibiting using the conflict minerals and communicates to all relevant stakeholders.
9.9 Security practice	Conformance	Policies and procedures state the Entity's commitment and approach to security activities that respect human rights, No direct body search is permitted, shall work in humane ways. The training is provided to security guards and are interviewed to ensure that security personnel understand the tasks and how to respect the human rights. No grievance or complaint again security activities has been received to date.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The site commits itself to respect the workers' rights. There are 11 elected labour union representatives including 2 women. In compliance to the local legal requirement, there are quarterly labour management committee meetings, and the results of the meeting are communicated to workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The management demonstrate the rights of Workers to collective bargaining is respected. The Entity and the trade union negotiated for a collective bargaining agreement at good willing, the agreement is achieved. The agreed

CRITERION	RATING	COMMENT
		collective bargaining agreement is approved by the government agency.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The criterion is not applicable as the Entity operates in Republic of Korea, in which the applicable Law does not restrict the right to freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	A document review, management interview and worker interview showed there is not child labour or young worker in the Entity, the youngest worker in the site was born on Dec. 10, 1996, joined in on Jul. 29, 2019. In Korea, the minimum working age is 15. The policy of not using child labour is established. The age of the candidate is verified by checking the ID cards, interview.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Republic of Korea. Young workers are (15 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. The Entity strictly follows the legal requirements.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Republic of Korea. Young workers are (15 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. The Entity strictly follows the legal requirements.
10.3a Forced Labour (human trafficking)	Minor Non-Conformance	The Entity commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking. One minor non-conformance is raised on the mandatory items in labour contracts signed between workers and one of in-house contractors.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in any form of forced labour. The Entity has a policy of prohibition of any kind of forced labour. Workers are not required any form of deposit, recruitment fee or equipment in advance.
10.3c Forced Labour (migrant workers)	Conformance	There is not foreign migrant worker in the Entity, all workers are Korean.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in any form of forced labour and does not provide loans or credit to workers.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in any form of forced labour. There is no restriction of workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in any form of 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 Entity is not involved in forced labour. Workers have the freedom to terminate their employment at any time without penalty, given notice in 30 days in advance.
10.4 Non-Discrimination	Conformance	<p>In employment and HR regulations, it is clearly defined that any form of discrimination is banned, Decisions in hiring, employing (such as compensation, promotion, access to training), or terminating workers are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics.</p> <p>Recruitment advertisement and training plans indicate no discrimination when hiring or providing the train opportunities to workers. The prior medical checks are conducted in the Entity, the medical check records show no discriminatory items, such as HB Antigen or HIV are included, nor pregnancy test.</p> <p>The interviewed women workers confirm that they feel equal with male workers in salary, promotion. Not be asked to do pregnancy tests, no discrimination due to maternity leave.</p> <p>All interviewed workers confirm no complaint about discrimination.</p>
10.5 Communication and engagement	Conformance	<p>Direct and frequent communication with the workers and the labour union representatives is established and implemented. As per the legal requirement and the labour management council regulation, the workers must be included in the negotiation of agreement process.</p> <p>The process to anonymously report grievances and complaints without fear of reprisal is established and communicated to workers. Workers can use intranet, email, hotline or to directly to their line managers to report their grievance and complaints.</p> <p>There are 11 union representatives, workers can go to them to complain or report their concerns. There are regular meetings between</p>



CRITERION	RATING	COMMENT
		<p>management and worker representatives. All complaint/concerns are discussed in the meeting and respond to workers.</p> <p>There is a grievance council in the Entity in which HR manager, compliance manager, labour union leader and co-leader are representatives.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity respects its employees, the policy of prohibition of sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation is established. The written disciplinary measures are defined and communicated to workers and there is no disciplinary action in last 3 years. All interviewed workers know the disciplinary measures, know how to appeal if they think it is unfair.</p>
10.7a Remuneration (living wage)	Conformance	<p>The wage structure is clearly defined, in compliance to the legal requirement, the notice of minimum wage is posted in bulletin board. The basic wage is above the legal minimum wage. The Entity pays to workers 150% of the ordinary wage for overtime in the working days and night time and holiday works; for overtime at night, pays 200%.</p> <p>There is national formal living wage, but it is not mandatory one, and the base wage is higher than legal minimum wage. All workers enrol in the social insurance scheme.</p>
10.7b Remuneration (method of payment)	Conformance	<p>For each pay period, Workers are provided with pay slips that clearly indicate compensation, including regular hours and regular wage, overtime hours and overtime compensation levels, subsistence, allowance and detail of deductions (such as insurance contributions, personal leave deduction, etc.)</p> <p>The wages are directly paid to workers by cash through bank transfer on 25th of each month which meets the local legal requirement.</p>
10.8 Working Time	Conformance	<p>The Working hours are recorded by finger-print scanning. For workers at workshop, there are 3 groups for 3 shifts. Workers have 2 hours rest in each shift and work 6 days in a row and have 1 dayqrest. The shifts are switched in every 2 weeks. Minimum 16 hours of rest is guaranteed during shift changes. For office staffs, the working time is one shift. The regular working</p>

CRITERION	RATING	COMMENT
		<p>time is 40 hours a week: 5 days with 8 hours in a day.</p> <p>Management procedure of working hours and overtime work is established to control the overtime.</p> <p>Working hours are monitored and are in compliance with Labour Law.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Occupational Health and Safety Policy is established, implemented, reviewed periodically and communicated with stakeholders. The Entity is certified against OHSAS 18001:2007, hold the valid OHSAS18001:2007 certificate.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>In compliance with the legal requirements and the requirements of OHSAS 18001:2007, the health &amp; safety policy is applied to including the workers of sub-contractors and contractors and visitors.</p> <p>For workers, the safety working instruction are established to define the control methods, the workers are provided the relevant training courses.</p> <p>For visitors, the hazards are informed and accompanied or monitored by the safety staffs.</p>
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	The health & safety policy states that Worker has the right to stop unsafe work. It is communicated to workers. The workers know their rights well.
11.2 OH&S Management System	Conformance	The site has implemented a documented OHSAS 18001:2007 Management system and holds a valid OHSAS 18001:2007 Certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of workers' consultation and participation in health & safety. The workers are encouraged to report their concerns on OH&S issues by themselves or by the labour union representative, 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 set up and documented in Occupational Health and Safety Program. The implementation plans are established and implemented. The achievement status of the targets is monitored periodically and will be reviewed in the annual management review meeting to identify the potential improvement opportunity.

**Document Control and Version History**

Revision	Date	Notes
0	18 February 2020	Issued (Full Certification)