
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TIANJIN ZHONGWANG ALUMINIUM CO., LTD

CERTIFICATE
NUMBER

77

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

19 MARCH 2020

DATE OF EXPIRY

18 MARCH 2023

CERTIFIED SINCE

19 MARCH 2020

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper, etc.)

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Tianjin Zhongwang Aluminium Co.,Ltd
ENTITY NAME	Tianjin Zhongwang Aluminium Co.,Ltd
CERTIFICATION SCOPE	Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper, etc.)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">6 January 2020 . 9 January 2020 (First Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 February 2020 (First Certification Audit)
AUDIT SCOPE	<ol style="list-style-type: none">Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper, etc.)The whole area of Tianjin Zhongwang Aluminium Co.,Ltd. except medium/thick plate workshop 1 and phase III/IV (in constructing) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

AUDIT
METHODOLOGY
DECLARATION

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.

CERTIFICATION
PERIOD

19 March 2020 - 18 March 2023

NEXT AUDIT
TYPE

Surveillance audit

NEXT AUDIT
DUE DATE

19 September 2021

CERTIFICATE
NUMBER

77

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	Entity has established procedure to collect the applicable legal law/regulation, the legal department, EHS department and Human Resource department are charged for the legal law/regulation collection and assessment at least once per year, cover the legal law on labour, ethics, health & safety and environment sections. But some laws/regulations are not updated and some legal law is missing.
1.2 Anti-Corruption	Conformance	Business ethics policy/procedure is established, including anti-extortion and bribery policy and gift policy, and training is provided to employees properly. The ethics reporting channel was posted in the meeting room, canteens, and due-diligence investigation on the high risk positions in the Entity, such as supplier management department, sales, quality, design departments, all the staff in those department has signed the honest commitment letter.
1.3 Code of Conduct	Conformance	Entity has established their code of conduct against the ASI performance standard, and provide training to workers periodically. They have communicated their code of conduct to their suppliers by conducting the due-diligence investigation, signing ASI performance standard commitment letters. The ASI code of conduct is included in the sustainable development report of 2019.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Entity has established a management system on environmental, social and governance compliance. The ASI management manual has been established, the Entity has obtained the ISO14001:2015 certificate and ISO45001:2018 certificate, both certificates are valid till 16 July 2022. The ASI policy has been posted on-site, covering social and governance components according to the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Strong commitment to implement the ASI management systems is established by the top management team of the Entity. The effectiveness of the system is reviewed during the annual management reviews.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	Entity has established ASI management manual according to the ASI performance standard, including the policy and procedures, however, the policy is not communicate to some employees clearly.
2.2 Leadership	Conformance	The Admin. Vice General Manager has been appointed as the management representative for ensuring the ASI social, environmental and governance requirements are reflected in the Entity. Responsibilities are defined in the appointment letter.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Entity has obtained the ISO14001:2015 certificate and ISO45001:2018 certificate, both certificates are valid till 16 July 2022, the audit scope cover the whole entity, include the ASI Performance Standard audit scope.
2.3b Environmental and Social Management Systems (social)	Conformance	Entity has established the ASI management system to cover the social management system. Internal audit and management review is conducted once per year to ensure the effectiveness of the ASI management system.
2.4 Responsible Sourcing	Conformance	The Entity is highly committed to responsible sourcing. Responsible sourcing is implemented in the Entity through signing ASI commitment letters, supplier assessments and emphasising on its suppliers to implement ASI standards.
2.5 Impact Assessments	Conformance	The Entity has assessed impacts regarding environment, health and safety, social responsibility, human rights and community regularly.
2.6 Emergency Response Plan	Conformance	The Entity has adequate and effective emergency response plans (ERP). The ERP is developed together with internal and external experts in the Entity. This includes crisis organisation, communication guidelines and business recovery plans. An Emergency response team (ERT) has been established and been trained annually. The ERP for health & safety and environment have been registered in local bureau. Drills of ERP are performed annually.
2.7 Mergers and Acquisitions	Conformance	All mergers and acquisitions are managed by the head company, not by the Entity. The due diligence process is managed and organised by

CRITERION	RATING	COMMENT
		head company. Head company procedures are relevant for the Entity. In the past 3 years, there has been no merger or acquisition in the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment is managed by head company. Head company procedures are relevant for the Entity. In the past 3 years, no closure, decommissioning or divestment is occurred in the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed the sustainable development report of 2019. The report will be disclosed to the stakeholders according to the requirement.
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliance and liabilities. The non-compliance issues are public on the website (https://www.qichacha.com/firm_ddb55525f2d02db3024b862ee26a2fb3.html) and the Entity has taken corrective actions to the non-compliance.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these anti-corruption requirements. This requirement is covered, through Transparency and Anti-corruption policies' deployment, and review of the financial audit report of 2018 issued by qualified third party. All payments to the Government are based on the legal law or contracts, such as social insurance fee and business tax. There is no other payment.
3.3b Payments to governments (disclosure . bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	1. Entity has obtained the ISO14001:2015 certificate and ISO45001:2018 certificate, both certificate is valid until 16 July 2022. 2. The Entity has developed and implemented policies, systems, procedures and processes that conform to the stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from stakeholders and has an appropriate resolution mechanism.

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The entity has developed and implemented policies, systems, procedures and processes that conform to these life cycle assessment (LCA) requirements. The entity has established a plan to complete LCA for all products. During the audit, LCA for one product (aluminium package material) has been finished according to the plan and the LCA report show the defined procedures and process are followed accordingly. However, the LCA for other products had not been finished.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	The entity has developed and implemented policies and processes for LCA (life cycle assessment). The policies claim it will provide LCA upon request. However, because the LCA for major products have not been finished, it could not provide LCA information to customers at present. The assessment is still in progress.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The entity has developed and implemented policies and processes for LCA (life cycle assessment). The policies claim it will publish LCA information through the company public website (http://www.zhongwangtj.com). However, because the LCA assessment for major products have not been finished, the publishing has not been performed.
4.2 Product design	Minor Non-Conformance	The entity has established procedures for LCA (Life Cycle Assessment) in products design process, the LCA shall consider various environment impacts including energy consumption, water, air emission and waste. At present, in the design phase all the environment factors of LCA have been identified and listed in the final design reports, however, no quantifiable data for each factor is determined and no continual improvement objective is set.
4.3a Aluminium Process Scrap (targets)	Conformance	The entity has established targets and improvement programs for each process to reduce scraps during production. 100% scraps are recycled by internal smelter workshop. The scraps generated rate is reviewed by management meeting monthly to ensure the targets are in not off track.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The entity has adequate and effective procedures including Solid Waste Classify Procedure and Solid Waste Management Procedure to classify and dispose the different kinds of aluminium scraps. All the scraps are classified in alloy separation and disposed by different smelters. Related records are kept well for review.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The entity has set strategy for recycling of products at end-of-life. Clearly targets for 2019 and 2020 and improvement programs are established. The yearly targets are reviewed monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The entity has a formal policy and procedures including Solid Waste Classify Procedure and Solid Waste Management Procedure for the internal aluminium recycling. All the recycled products are managed by the internal smelter workshop. The entity has a clear target for the rate of recycled aluminium in final products. The recycled aluminium is comprised of internal scraps and re-smelter aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The entity has published the GHG (Green House Gas) data in the public website (http://www.zhongwangtj.com/newsdetails.aspx?id=627&CatId=29&ParentId=28). The GHG calculation is performed by qualified third party.
5.2 GHG emissions reductions	Conformance	The entity is planning to reduce CO2 emissions by 1% per year and 3% before end of 2022 and has made improvement programs covering direct emission sources and indirect emission sources to achieve the target. At present is major GHG generation sources are electricity and natural gas and the source of electricity is 100% coal-fired. The management team annually reviews the progress. All the energy data is tracked and reviewed monthly. The GHG reduction plan is available for public upon request.
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.

CRITERION	RATING	COMMENT
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	<p>The entity has established an air emission inventory for all the air emission sources for all the outlets. The entity has engaged a qualified third party to monitor the outlets quarterly. The entity is one of key pollution discharge unit in Tianjin and has never been prosecuted by local environment bureau for the air emission discharge. The entity has set continually reduction targets for major indexes such as sulphide and oil frog from 2018 to 2022, the targets are tracked and reviewed by management team annually. To achieve the targets, the entity has implement improvement programs to reduce the waste air emission. The entity has incorporated the air emission data into annual Continual Development Report which is available upon request.</p>
6.2 Discharges to Water	Minor Non-Conformance	<p>The entity has established wastewater inventory to control the discharges to water. All the industrial wastewater is collected and treated by internal WWTPs (wastewater treatment plants) prior to discharging to local municipal WWTP which is managed by government. The entity has established an online monitoring system for the final outlets and required qualified third party to monitor the control indexes quarterly. The entity is one of key pollution discharge unit in Tianjin and has never been prosecuted by local environment bureau for the water discharge. The entity has established continual reduction plan for the wastewater discharging and all the improvement programs are in tracking. The entity has incorporated the wastewater management information into annual Continual Development Report which is available upon request. The monitoring plan required by EIA (Environment Impact Assessment) report shows the entity shall conduct quarterly monitoring for outlets of each WWTPs and final outlet of boundary. However, actually only final outlet of boundary is monitored accordingly. In addition, the entity does not keep records of dealing with the excessive results identified in the internal daily monitoring.</p>

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The entity has conducted leakage assessment annually and the latest assessment is finished in December 2019. Six high risks are identified and the entity has taken preventive actions/improvement programs for all the potential risks.
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	The entity has conducted leakage assessment annually and the latest assessment is finished in December 2019. Six high risks are identified and the entity has taken preventive actions/improvement programs for all the potential risks. Emergency response programs of spill and leakage are established and registered in local environment bureau. However, the spill and leakage prevention actions are not adequate for oil storage and hazardous waste warehouse. For example, no way to detect if there is leakage of underground oil tanks and no secondary containers for hazardous waste. The oil is hazardous chemical and used for cooling in the manufacturing process and the hazardous waste is generated by the wastewater treatment station.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The environment protection procedure defines how to dispose and report spills. If there is spill, the ERT (Emergency Response Team) would follow the response process to deal with it accordingly and spill drill has been conducted annually to ensure the process is up to date.
6.4b Reporting of Spills (regular reporting)	Conformance	No spill has occurred in the past few years. ASI Manual defines entity will report the spills to local authorities and impacted units and people immediately and disclose it in the annual Continual Development Report which is available upon request.
6.5a Waste management and reporting (strategy)	Minor Non-Conformance	Waste management procedure defines processes to collect and dispose all the waste. All the hazardous waste is transferred to qualified third parties according to legal requirements. Inventory and disposal receipts are kept for review. It has established continual improvement targets to reduce the waste generation and the targets are reviewed annually by senior management team. The entity has established a labelling system for the hazardous waste and all the containers has been posted with legal standard labels,

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		however, the date of generation is not completed for all labels.
6.5b Waste management and reporting (disclosure)	Conformance	The entity has incorporated the waste management information into annual Continual Development Report which is available upon request.
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Conformance	Scraps Management Procedure defines adequate and effective process to collect and recycle aluminium dross. Prior to being sent to professional vendors, the entity has process to recycle the aluminium internally. At present about 40% of aluminium dross is recycled.
6.8b Dross (recycling)	Conformance	The final aluminium dross is recycled and refined by internal smelters. It is used as a material rather than as waste and the final waste

CRITERION	RATING	COMMENT
		is sell to another factory which transfers the dross to fire resistant materials
6.8c Dross (review of alternatives)	Conformance	The entity has monthly reviews of the dross recycling management to seek improvement programs to reduce the final dross. The aluminium dross is recycled by internal smelters. It is used as a material rather than waste and the final residue is sold to another factory which transfers the dross to fire resistant materials. There is no landfill of dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Minor Non-Conformance	The entity has assessed the water consumption via a qualified third party through the environment impact assessment reports when the factories founded. This indicated the water source is compliant with legal requirements and approved by local bureau. The entity has established water mapping and regularly reviews the updates and changes. However, the water mapping and inventory do not identified the water final sources.
7.1b Water assessment (risk assessment)	Minor Non-Conformance	The entity has conducted water risk assessment annually, however, the water risk assessment does not concern the impacts of water suppliers and wastewater treatment contractors.
7.2a Water management (management plans)	Conformance	The entity has annual targets to continually reduce the water consumption and has established programs including plans of improvement actions, timeframe and responsible individuals to achieve the targets.
7.2b Water management (monitoring)	Conformance	The entity has annual targets to continually reduce the water consumption and has established programs to achieve the targets. The targets and progress of programs are reviewed quarterly.
7.3 Disclosure of water usage and risks	Conformance	ASI Manual defines policy and procedure on how to publish the water management information and it has been published in annual Continual Development Report which is available upon request. The published information includes water management and control programs.

CRITERION	RATING	COMMENT
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is covered by EIA (Environment Impact Assessment) reports which are performed by qualified third party. The entity is not located at a government managed industrial zone which is not protected area. No any evidence shows the entity has negative impact to the biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The entity has established action plans for the biodiversity management and the plans are approved by local environment bureau.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The entity has established action plans for the biodiversity management and the plans, which are consultative and designed in accordance with the biodiversity mitigation hierarchy, are approved by local environment bureau.
8.2c Biodiversity management (reporting)	Conformance	The entity has reported its biodiversity management and outcomes through annual Continual Development Report which is available upon request.
8.3 Alien Species	Conformance	The entity has annually assessed the alien species and no high risk is identified.
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 Entity has established its policy and procedure to comply with human rights in ASI management manual. The Entity identifies the risk of human rights and provides the training for all employees.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has established a procedure to conduct the human rights due-diligence, however, the procedure does not cover the

CRITERION	RATING	COMMENT
		frequency and scope on how to conducting human rights due-diligence.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not caused or contributed to adverse Human Right impacts. The Entity has established its code of conduct to comply with human rights. Externally and internal communication channels are established for workers and stakeholders. The entity have taken corrective action to all the complaints and communication issues accordingly.
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met, such as women in the facility are not work on the hazardous positions which prohibit by legal law of Special Rules on the Labor Protection of Female Employees, sets activities to support work-life balance especially for women.
9.3 Indigenous Peoples	Not Applicable	Not applicable, there is no Indigenous Peoples in the areas where the entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, there is no Indigenous Peoples in the areas where the entity operates.
9.5 Cultural and sacred heritage	Not Applicable	Confirmed through environmental impact assessment report that no cultural and sacred heritage is affected by the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	Facility has established ASI performance manual to Confirm through environmental impact assessment report, no resettlement is necessary.
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 Entity has established ASI management manual, and respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity is in close contact with surrounding communities. Most of its employees are from the local area. The environmental impact assessment report indicates that the facility has installed environmental protection device, such as air emission treatment facility, to reduce the

CRITERION	RATING	COMMENT
		impact to the surrounding communities which caused by air emissions and boundary noise.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with surrounding communities. Most of its employees are from the local area. Entity has established plan to support the surrounding communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established an ASI management manual and does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Through internal investigation from due diligence investigation reports as well as the supplier signed commitments, no material is come from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The security is provided through its own staff. Staff are trained on the ASI performance standard and has to comply. All security staff are trained at least once per month, including the respect of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the workers' rights in its code of conduct and expects the same of its suppliers. The Entity has one labour union.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of workers to collective bargaining, participate in any collective bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for workers, one labour union exist in the Entity.
10.2a Child Labour (minimum age)	Conformance	No child labour (below 16 years old) or young workers (from the age of 16 to 18) is used by the Entity.
10.2b Child Labour (hazardous)	Conformance	There is no child labour or young workers in the Entity in the past 12 months. Young workers (from the age of 16 to 18) are under special protection. They are not allowed to work in hazardous working environment.
10.2c Child Labour (worst forms)	Conformance	No child labour (under 16 years old) is used by the Entity. Young workers (from the age of 16 to

CRITERION	RATING	COMMENT
		18) are under special protection. The Entity commits itself and expects its suppliers to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI management manual, and commits itself and expects its suppliers to comply with the prohibition of forced labour, slavery and human trafficking. No type of forced labour is found in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in forced labour. All employees are employed directly, no deposits, fees, advances is required from employees.
10.3c Forced Labour (migrant workers)	Not Applicable	The Entity is not involved in forced labour. Workers are all local citizens.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in forced labour. No deposits or security payments are permitted.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in forced labour. There is no restriction of workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in forced labour. The Entity does not hold any original document, passport or permit, only copies of ID in the personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in forced labour. The time for announced termination of the working contract is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has established policy/procedure on anti-discrimination for the hiring, promoting, training processes and etc.
10.5 Communication and engagement	Conformance	The Entity encourages workers to participate in the ASI management system. Direct and frequent communication with workers and the representatives of the worker councils is established. A positive working climate and direct communication were mentioned by interviewed persons.
10.6 Disciplinary practices	Conformance	As per the ASI management manual, the facility does not tolerate any form of punishment and harassment. It requires its suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. All the disciplinary records are

CRITERION	RATING	COMMENT
		needed to be confirmed by workers and management.
10.7a Remuneration (living wage)	Conformance	The wage is in compliance with legal standard, and meets the basic needs of workers. All the employees are enrolled in the social insurance. The Entity would pay the whole social insurance fee as incentive for employees work in the Entity more than 12 months, including the fee need to be paid by employees, which is outstanding performance in China.
10.7b Remuneration (method of payment)	Minor Non-Conformance	The payments are documented and submitted to workers timely to the employees' bank accounts except two months.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded electronically and monitored. The weekly working hours, total working hours are not exceeded against the legal requirement or industry standards. Some workers however' do not have 1 day off in every 6 days, and they have not established the annual leave policy.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The entity has obtained a valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has established formal policies for occupational health & safety which are posted in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has adequate and effective policies and procedures to ensure all workers and visitors follow internal occupational health & safety rules, including orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has established formal policies for occupational health & safety including legal compliance.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has established formal policies for occupational health & safety including the right to stop unsafe work and providing safe working environment.
11.2 OH&S Management System	Minor Non-Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The certification body has conducted supervision audit for the entity in April 2019 and a total of 5 minor findings and 4 observation findings are issued. All of them are related to risk control. The entity has taken actions approved by certification body to correct those findings. However, non-conformances related to the findings found in the last ISO45001 audit were still observed during this audit. For example, the entity does not arrange occupational disease health check for workers involved in hazards in the past year. It also does not obtain legal required permits and reports such as fire safety/lightning safety/occupational disease control for phase II buildings. It does not effectively control the PPE expiry dates, hot works, fire water, gas detectors.
11.3 Employee engagement on health and safety	Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has adequate and effective mechanisms to collect workers' feedback on occupational health & safety. The mechanisms include suggestion boxes, worker representative meeting and irregular worker interview, accident/injury analysis. Related records have been managed soundly since the founding of the business.
11.4 OH&S performance	Conformance	The entity has obtained valid ISO 45001:2018 certificate (Certificate Number: 44 126 1985 0009, Issue Body: TUV NORD, Valid Date: from 17 July 2019 to 16 July 2022) covering the whole certified scope. The entity has set targets and control programs for accident/injury/fire on

CRITERION	RATING	COMMENT
		occupational health & safety. The management has reviewed the programs and targets monthly.
