
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CHALCO RUIMIN CO., LTD.

CERTIFICATE
NUMBER

92

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

21 AUGUST 2020

DATE OF EXPIRY

20 AUGUST 2023

CERTIFIED SINCE

21 AUGUST 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

Chalco Ruimin manufactures and sells Aluminium Can Body Stock, aluminium materials for electronics applications, aluminium materials for high-end offset plate and aluminium materials for transportation. The main processes include remelting and casting, hot rolling, cold rolling and finishing.

Chalco Ruimin owns two plants: One plant at 8 Luoxingta Road, Mawei, Fuzhou, Fujian, China and the other plant at Connecting Line of Jianghua Avenue, Lianhua District, Huaqiao Farm, Jiangjing Town, Fuqing, Fuzhou, Fujian, China.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME CHALCO RUIMIN CO.,LTD

ENTITY NAME CHALCO RUIMIN CO.,LTD

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SUPPLY CHAIN ACTIVITIES

- Casthouses
- Material Conversion (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- First Certification Audit

AUDIT FIRM DNV GL

AUDIT DATE

- 28 June . 1 July 2020

AUDIT REPORT SUBMISSION

- 7 August 2020

AUDIT SCOPE One plant at 8 Luoxingta Road, Mawei, Fuzhou, Fujian, China and the other plant at Connecting Line of Jianghua Avenue, Lianhua District, Huaqiao Farm, Jiangjing Town, Fuqing, Fuzhou, Fujian, China.

Supply chain activities included in the audit scope:

- Casthouses
- Material Conversion (Production and Transformation)

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

AUDIT OUTCOME

- 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

21 August 2020 - 20 August 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

20 February 2023

CERTIFICATE
NUMBER

92

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes to maintain awareness of and ensure compliance with applicable law. The Entity holds a valid ISO 14001:2015 certificate and a valid ISO 45001:2018 certificate.
1.2 Anti-Corruption	Conformance	Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent corruption are developed and implemented. And training records of personnel trained in these processes have been verified. The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing standards. The Entity also has a Policy for Labour and Business Ethics that can be found via the following link: http://www.ruimin.com/xxgk/772.jhtml .
1.3 Code of Conduct	Conformance	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 relevant information is available for all interested stakeholders on the Entity's website: http://www.ruimin.com/xxgk/769.jhtml .
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. All policies are available via the following link on the Entity's website: http://www.ruimin.com/xxgk/772.jhtml .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented policies. And the policies and procedures are reviewed and updated on a regular basis. The Entity holds valid ISO 9001, ISO 14001 and ISO 45001 certificates.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are available for internal and external stakeholders through training, post on-site and publishing on website.

CRITERION	RATING	COMMENT
		<p>The policies can be found via the following link: http://www.ruijin.com/xxgk/772.jhtml.</p>
2.2 Leadership	Conformance	<p>The Entity has nominated a senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate that can be found via the following link: http://www.ruijin.com/txfz/index.jhtml.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented a Social Management System. And holds a valid ISO 45001:2018 certificate. The main social, occupational health and safety impacts are identified and assessed, the associated management provisions for preventing and/or mitigating these impacts are established and implemented.</p> <p>The relevant information for ISO 45001:2018 certification can be found via the following link: http://www.ruijin.com/txfz/index.jhtml.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party due diligence audits at major next tier suppliersq sites to qualify them. The procurement team and relevant personnel are trained on responsible sourcing requirements on an annual basis. The purchasing policies can be accessed via the following link: http://www.ruijin.com/xxgk/792.jhtml.</p>
2.5 Impact Assessments	Conformance	<p>Environmental, social, cultural and Human Rights Impact Assessments are implemented in accordance with the ASI and the relevant legal requirements.</p> <p>The Entity will conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity holds a valid ISO 14001:2015 certificate and a valid ISO 45001:2018 certificate. Emergency Response Plans are</p>

CRITERION	RATING	COMMENT
		developed and implemented, Personnel training and drill records are verified during the audit.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since 2018.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for Closure, Decommissioning and Divestment is established in accordance with the requirement of the ASI Performance Standard. But no such case has happened since 2018.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material, environmental, social and economic impacts. Disclosures can be found as follows: 2019 Sustainability Report: http://www.ruijin.com/xxgk/778.jhtml ; 2019 Social Responsibility Report: http://www.ruijin.com/xxgk/779.jhtml .
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in their Social Responsibility Report. There are no significant fines or penalties imposed on the Entity as reported in 2019 Social Responsibility Report, under the Community Support section, p. 13. Disclosures can be found via the following link: http://www.ruijin.com/xxgk/779.jhtml .
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in their 2019 Sustainability Report, under the Business Briefing section, p. 4, that can be found via the following link: http://www.ruijin.com/xxgk/778.jhtml .
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 mechanisms exist (e.g. whistle blower hotlines, mail address, suggestion box). Please find it on p. 4 of the Entity's Policy for

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		Responsible purchasing that can be accessed via the following link: http://www.ruijin.com/xxgk/792.jhtml
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Environmental Life Cycle Assessment is conducted and documented. And the Environmental Life Cycle Assessment report is published on the website of the Entity: http://www.ruijin.com/xxgk/776.jhtml
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 product. The Environmental Life Cycle Assessment report can be provided by external communication if required. The information is available and will be provided upon request, or could be downloaded from the Entity's website: http://www.ruijin.com/xxgk/776.jhtml
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The public communication on LCA includes public access to the LCA information and its underlying assumptions, including system boundaries. The Environmental Life Cycle Assessment report is published on the website of the Entity: http://www.ruijin.com/xxgk/776.jhtml
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 product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and the generated target of scrap for collection, recycling and/or re-use, is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity implements separate Aluminium alloys and grades for recycling. The generated target for process scrap utilization rate is 100%.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities and targets. And the Entity is communicating with the main customer to discuss about how to improve the recycling rate of products at end-of-life.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Because there are no completely local, regional or national collection and recycling systems for aluminium scraps in China, the Entity is working with the customer to decide how to improve the recycling rate of products at end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The major Scopes 1, 2 Greenhouse Gases emissions (GHG) and energy use by source are tracked, calculated and documented annually. Refer to sections 2 & 3 of 2019 GHG emissions report. The information can be accessed via: http://www.ruijin.com/xxgk/777.jhtml . The GHG emissions are not checked by a third party.
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emissions reduction target towards 2020, which should reduce the GHG emissions per product based on the level of 2019, aligning with the group target assigned. The main strategy is to reduce the unnecessary electricity consumption and to increase the scrap recycle rate. Refer to sections 1 & 2 of the GHG emissions reduction target. The information can be accessed via: http://www.ruijin.com/xxgk/780.jhtml .
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 discharge limit. Conducted an air emission management plan with actions/controls to mitigate adverse impacts.
6.2 Discharges to Water	Conformance	Discharges to Water are covered and managed within the Environmental Management System. The Entity set up water reduction targets and established a related plan to minimize adverse impacts. The monitoring reports for waste water show major pollutants were monitored. The

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		monitoring results for these major pollutants meet the local legal discharge 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 for the 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 leakage will be handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of spills/leakage is defined in Environment Emergency Preparedness and Response Management Procedure. No spills/leakage happened in 2019. The information can be accessed via: http://www.ruijin.com/xxgk/781.jhtml .
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spills/leakage and remediation actions taken will be published in the annual sustainability report. No spill/leakage happened in 2019. The information can be reached via: http://www.ruijin.com/xxgk/781.jhtml .
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. The Entity implemented a waste management strategy according to the waste mitigation hierarchy. The inventory of wastes generated in the operation is established, the control methods for the different types of waste are defined. The main hazardous wastes are diatomite with oil and waste oil including rolling oil and mineral oil. The disposal of hazardous waste is in compliance with the legal compliance, all hazardous wastes are transferred to qualified suppliers for disposal. Each transfer is registered specifically in the website of the Environment Protection Ministry: http://gf.mepscc.cn . The transfers in 2019 are audited, no non-compliance is found.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposals information in the Waste Management Report for 2019. This is published on the official website: http://www.ruijin.com/xxgk/782.jhtml .

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Aluminium taken from the dross pressing will be recycled in the melting furnaces of Chalco Ruimin Co., Ltd. The rest is sold to the outside dross processors for further extracting the remaining Aluminium. This can be used to produce Aluminium alloying ingots and cement materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the dross pressing will be recycled in the melting furnaces of Chalco Ruimin Co., Ltd. for recycling the dross residue. The rest is sold to the outside dross processors for recycling the dross residue, which can be used to produce Aluminium alloying ingots and cement materials.
6.8c Dross (review of alternatives)	Conformance	There is no dross residue sent to landfill.

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7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System, is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The water risk assessment considered the Entity's Area of Influence. Due to the nature of the product and production processes in the local water environment, the level of water-related risk was found to be low.
7.2a Water management (management plans)	Not Applicable	There were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	There were no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Water usage and risks assessment report is published in sections 1-8 of the Assessment Report of Water-Related Risks, please see: http://www.ruimin.com/xxgk/785.jhtml .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System. The risk or impact by the operation of Chalco Ruimin Co., Ltd. and in its Area of Influence on biodiversity was assessed as low. The assessment involved qualified third parties and the report was approved by the local Environmental Protection Bureau (EPB). For further information, please see sections 1-8 of Biodiversity Risk Assessment Report: http://www.ruimin.com/xxgk/786.jhtml .
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts, Not Applicable rating.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts, Not Applicable rating.
8.2c Biodiversity management (reporting)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts, Not Applicable rating.

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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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The policy commitment to respect human rights is set up and communicated to all employees. The policy is accessible via: http://www.ruimin.com/zrsj/index.jhtml .
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights. A Human Rights Due Diligence process is established and implemented. As per the risk assessment report, the risks on human rights are identified and assessed, the major risks are in the supply chain, the associated mitigation and control measures are established and implemented, such as audit on major suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	As per the risk assessment report, the major risks are from the supply chain. The ASI management procedures for suppliers and on-site contractors are established and implemented. The on-site audits are performed for the major suppliers, to assess and control the risks & negative impacts. The complaint/grievance channel is established, the stakeholders including workers can use suggestion box, public email, hotline to report grievance/concerns or complaints. The worker representatives can do it for workers. As per the audit reports of suppliers, ASI audits, no adverse case is reported. On the Internet, no negative news is found on human rights of the Entity and its major suppliers.

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9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. A Special Collective Contract for the Protection of the Special Rights and Interests of Female Workers is signed between the trade union and the Entity to provide the extra protection measures beyond the local legal requirements. No complaint is received from women workers. Women workers know their rights.
9.3 Indigenous Peoples	Not Applicable	Not Applicable. There are no indigenous peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not Applicable. There are no indigenous peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	Not Applicable. There are no Cultural and sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not Applicable. There is no project causing resettlements in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	Not Applicable. There is no project causing resettlements in the history of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity establishes the policy to commit to respect the legal and customary rights and interests of local communities in their lands and livelihoods and their use of natural resources. The Entity conducts the risk assessment on local communities' rights and the contribution to the local communities.
9.7b Local Communities (impacts)	Conformance	The Entity identifies and assesses the impact on the local communities. The control measures for the identified impact on local communities are established and implemented. No complaint is received from the local communities. The interviewed workers who are from local communities, state that the communities get benefits from the businesses of the companies located in the area, the Entity is one of them. The Entity joins the initiative of the local government to help the poor peoples in the local communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with local communities. Some of its employees are from the local communities. The Entity joins the initiative of the local government to help the poor

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		peoples in the local communities. For information about the initiative, please refer to section 5 in: http://www.ruijin.com/xxgk/779.html .
9.8 Conflict-Affected and High-Risk Areas	Conformance	The site makes a commitment of not using conflict minerals and communicates it through the aluminium value chain. As part of the due diligence process, all suppliers are required to sign the commitment letter to promise not to use the conflict mineral; No complaint on this issue has been received.
9.9 Security practice	Conformance	Defined in contract signed between the Entity and the security company, the policies and procedures state the Entity's commitment and approach to security activities that respect human rights, a body search is not permitted, shall work in humane ways. The training is provided to security guards to ensure they understand their tasks and the way to respect human rights. No grievance or complaints against security activities have been received.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits itself to respect the workers' rights. There is a trade union in the Entity with a committee of 15 members including 9 women. The 90 worker representatives are elected including 17 women.
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. There are 3 collective bargaining agreements in the company on overall workers rights, compensation and protection of women workers. All terms in the 3 collective agreements meet or go beyond the local legal requirements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives can deal with the workers' concerns with management on behalf of workers. The workers interviewed know how to complain or report their concerns.
10.2a Child Labour (minimum age)	Conformance	There is no Child Labour or young workers in the company. The youngest worker at the site was born on June 28, 2001, joined on July 08, 2019.

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10.2b Child Labour (hazardous)	Conformance	There is no Child Labour or young workers in the Entity. The Entity establishes the management procedure to protecting the young workers (16 to 18 years), which is in compliance with the local legal requirements and does not allow young workers to work under hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself - and expects its suppliers - to comply with the prohibition of Child Labour. There is no Child Labour or young workers in the Entity. The Entity communicates the requirement to the workers and its suppliers to ensure the legal requirements on Child Labour and young workers are followed internally, and for the supply chain.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking. The Entity communicates to the workers and suppliers on this issue to guarantee no forced labour happens internally and in the supply chain. No case of human trafficking is reported or heard.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in forced labour. It is verified by worker & management interview and reviewing of pay rolls, that all employees, direct and dispatched, are not required any form of deposit, recruitment fee or equipment at any stage of the employment.
10.3c Forced Labour (migrant workers)	Not Applicable	Not Applicable. There are no foreign migrant workers in the Entity; all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity prohibits any form of forced labour and does not provide any form of loans to workers. In the labour contracts signed between the Entity and the workers, between the labour agency and the workers, no term of Debt Bondage is found. The pay slips of workers indicate there is no illegal deduction.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in forced labour. There is no restriction of workers' freedom of movement at the site. Workers are free to leave the factory when not engaged in work. Workers

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		can move freely when needed to access basic liberties, such as going to the toilet, or drinking water. They can go to external medical facilities when they do not feel well.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in forced labour. There is no retention of original documents of the workers, only copies of original documents are kept in workers' personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity is not involved in forced labour. The signed labour contracts do not contain language to limit the workers' ability to voluntarily terminate their employment.</p> <p>The workers know their rights to terminate their employment without penalty, the required notice time for terminating the employment is in compliance with the Labour Contract Law: 30 days in advance or 3 days in the period of probation.</p> <p>The workers who resign, get their wages without delay.</p>
10.4 Non-Discrimination	Conformance	The Entity is committed to non-discrimination. No case of discrimination is received. The recruitment advertisement and the training plan indicate the decisions are solely based on the candidate's ability to perform the job's requirements, rather than on other personal characteristics. The interviewed workers confirm they feel equal in the company.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the workers and the worker representatives is established. The communication channels are announced to the workers and the workers can complain and raise their concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	A written procedure is established to prohibit any forms of sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation. The disciplinary measures are approved in the worker representative meeting, compliance with legal requirements and require the confirmation of involved worker.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, the basic wage is above the local legal minimum wage. The compensation for the overtime work meets the legal requirements. The mandatory allowances are provided to the workers. The total payment meets the workers' basic needs. All employees enrol in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	The payment of wages is documented and timely paid to all workers by bank transfer on the 25th of the following month. The detailed information about wages, allowance, overtime work compensation and deduction, can be accessed on internal OA system.
10.8 Working Time	Conformance	Working hours are recorded with a finger-scanning meter. The regular working time is 40 hours a week, 5 days. For workers at a workshop, there are 4 groups for 3 shifts. For office staff, only one shift. Working hours are monitored, the monthly overtime working hours do not exceed the legal monthly limit, at least one day off in a week is guaranteed.
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. The Entity holds a valid OHSAS 18001:2007 certificate, and the transition audit against ISO 45001:2018 was performance. No major non-conformance was raised in the audit, the certificate issuing is in progress.
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/ISO 45001:2018.
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 to evaluate the legal compliance at least once a year.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided training courses to understand the hazards, OH&S risks and actions determined as relevant for them and their right to refuse unsafe work. The Entity has

CRITERION	RATING	COMMENT
		a measure to protect workers from undue consequences for doing so.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 Certificate.
11.3 Employee engagement on health and safety	Conformance	In compliance with the requirements of Clause 5.4 of ISO 45001:2018, the Entity has a system of workers' consultation and participation in health & safety. The workers are encouraged to report their concerns or advice on OH&S issues by themselves, or by the worker representative. The management responds to the concerns and advice from workers on OH&S issues.
11.4 OH&S performance	Conformance	11 Health and Safety targets are set up and documented in Occupational Health and Safety Program. The implementation programs are established and implemented. The achievement status of the targets is monitored periodically. Currently, the implementation of the management programs for the OH&S targets is on track.

Document Control and Version History

Revision	Date	Notes
0	21 August 2020	Issued (Initial certification audit)