

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

LUOYANG WANJI ALUMINIUM PROCESSING CO.,LTD

CERTIFICATE
NUMBER

96

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

CHINA QUALITY
MARK
CERTIFICATION
GROUP

DATE OF ISSUE

29 SEPTEMBER 2020

DATE OF EXPIRY

28 SEPTEMBER 2023

CERTIFIED SINCE

29 SEPTEMBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, 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

Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main products include tank cover material, ring pulling Material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft package, medicine foil, etc. the main processes include rolling, straightening, trimming, annealing, slitting and packaging.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
ENTITY NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
CERTIFICATION SCOPE	<ul style="list-style-type: none">Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main Products include tank cover Material, ring pulling Material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft package and medicine foil. The main Processes include rolling, straightening, trimming, annealing, slitting and packaging.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">29 . 31 July 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 September 2020
AUDIT SCOPE	<p>The Audit Scope covered related activities and Facilities involved in the production Process of aluminium strip and aluminium foil Products. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant supply chain activities, and Criteria in the 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

29 September 2020 . 28 September 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

28 March 2022

CERTIFICATION
NUMBER

96

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The General Management Department and the Safety and Environmental Protection Department of the Entity are responsible for collecting Applicable Laws and regulations and evaluating Compliance in quality, environmental protection, work safety, Occupational Health and Safety, energy, labour law and social responsibility at least once a year. Each department is responsible for communicating relevant requirements to all employees and complying with them.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has formulated the Anti-Bribery Policy and set up an Anti-Bribery risk assessment team, headed by Liu Quanguai (its Vice President and Management Representative), with a total of 7 members from various departments. On 20 March 2020, the Entity conducted the Anti-Corruption and Anti-Bribery training on laws and regulations, basic requirements and case study, with a total of 89 participants, and inspected training records, sign-in sheets and of training effect feedback forms in random. All the participants in the training were middle-level leaders, and there was no evidence to show whether all the personnel at the High-Risk positions participated.
1.3 Code of Conduct	Conformance	The Entity has stipulated Codes of Conduct in Article 1.3 of the ASI Performance Assurance Manual, covering its environmental Code of Conduct (7 articles), social Code of Conduct (10 articles) and governance Code of Conduct (6 articles).
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has stipulated environmental, social and governance Policies in Article 0.5 of the ASI Performance Assurance Manual.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In Article 0.1 "Letter of Commitment on ASI Performance Standard Management System" of ASI Performance Assurance Manual, Wu Jun, the General Manager of the Entity, made the management commitment on 25 February 2019, and appointed Liu Quanguai, the Deputy General Manager of the Entity, as the ASI Management Representative to ensure resource support.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has stipulated environmental, social and governance Policies in Article 0.5 of the ASI Performance Assurance Manual. The Entity communicates its Policies to the public on its website at http://wanji-al.bce206.lyqingfeng.cn .
2.2 Leadership	Conformance	The Deputy General Manager of the Entity, is appointed as the ASI Management Representative under Article 0.6 "Letter of Appointment" of ASI Performance Assurance Manual, and

CRITERION	RATING	COMMENT
		responsibilities there are clearly defined in the Letter of Appointment.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has obtained ISO14001 Certificate issued by ZHONG'AN ZHIHUAN Certification Centre on the basis of ISO14001:2015. The Certification address: Wanji Industrial Park, Xin'an County, Luoyang, Henan. Scope of Certification includes production of aluminium alloy plates, strips and foils and related activities. The Certificate is valid from 20 September 2018 to 19 September 2021.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has formulated the requirements of Social Management System on Human Rights and Labour Rights and interests in Chapters 9-10 of ASI Performance Assurance Manual, for management of the Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has stipulated relevant requirements for Responsible Sourcing in Article 2.4 of the ASI Performance Assurance Manual. The Entity has established a Procurement Control Procedure, in which the Raw Material Supply Department conducts investigation and evaluation on suppliers prior to procurement, communicates with suppliers through procurement contracts or procurement ancillary Agreements, and thereafter re-evaluates suppliers on an annual basis in terms of the environmental, social and governance risks of ASI, which should meet the requirements of Entity's ASI Policy.
2.5 Impact Assessments	Minor Non-Conformance	The Entity has stipulated the relevant requirements for conducting environmental, social, cultural and human rights impact assessment of major changes in new projects or existing facilities in Article 2.5 of the ASI Performance Assurance Manual, and formulated the Control Procedure for Environmental and Occupational Health and Safety Assessment of New Projects which stipulates the requirements for declaration, environmental impact, risk evaluation and documentation of new projects, excluding gender analysis.
2.6 Emergency Response Plan	Conformance	The Entity has stipulated relevant requirements of an Emergency Response Plan in Article 2.8 of the ASI Performance Assurance Manual.
2.7 Mergers and Acquisitions	Conformance	The Entity has stipulated relevant requirements for Mergers and Acquisitions in Article 2.7 of the ASI Performance Assurance Manual. It also has formulated Merger and Acquisition Procedures, as well as the working Procedures, including preparations before implementation, various possible risks, risk avoidance in transactions and other requirements.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has stipulated relevant requirements for Closure, Decommissioning and Divestment in Article 2.8 of the ASI Performance Assurance Manual. It also has formulated the

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		Control Procedure for Closure, Decommissioning and Divestment and the working Procedures.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	<p>The Entity has provided a Sustainability Report 2019 released on 15 December 2019, including seven parts: public disclosure of data, main sustainability Report, environmental performance index Report, labour performance index Report, Human Rights performance index Report, social performance index Report and product performance index Report. http://wanji-al.bce206.lyqingfeng.cn.</p> <p>The publicly disclosed Sustainability Report describes Non-Compliance events in Human Rights protection in 2019 on page P12 (see Part II: V: Human Rights Performance Indicators Report of this Report for details), but also describes: "No violations of regulations or disciplines and non-Compliance events in economy, environment, resources, Human Rights and society are found in the Entity throughout the year", so the contents of the Report are inconsistent. (According to the on-site confirmation of the Audit Team, the non-Compliance of Human Rights protection did not occur in the enterprise in 2019, which was caused by a mistake in the Sustainable Development Report).</p>
3.2 Non-Compliance and liabilities	Conformance	<p>The Entity has provided information on Non-compliance and liabilities, and publicly disclosed its governance practices and Sustainability Development Report. http://wanji-al.bce206.lyqingfeng.cn.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has formulated and implemented Policies, Systems, Procedures and Processes that meet these Anti-Corruption requirements.</p>
3.3b Payments to governments (disclosure . Bauxite Mining)	Not Applicable	<p>This Criterion is Not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has set up a feedback and communication platform for Stakeholders on its website, made its information such as contact number and email available for the public through billboard, and received information inquiries, complaints and appeals from all parties. At the same time, the Entity also has set up a Group Post Bar, with its specialised management department to track the requests and complaints of Stakeholders, and established an appropriate settlement mechanism.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed and implemented Policies, Systems and Processes that meet these Life Cycle Assessment (LCA) requirements, and conducted LCA on its main Products (aluminium strips and aluminium foils). There is a lack of sensitivity analysis in the assessment Report, and the non-methane emission data in the environmental emission data list cannot be traced back to the source.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	The Entity has stipulated relevant requirements for environmental life cycle assessment (life cycle impacts) in Article 4.1 of the ASI Performance Assurance Manual. The Entity has formulated the Control Procedures for Identification and Evaluation of Environmental Aspects, and has developed and implemented policies, systems and processes that meet these LCA information requirements. The Entity has conducted life cycle assessment on its main products (aluminium foil), and provided LCA information to its clients. The LCA on aluminium strip has not been available for the time being.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The Entity has stipulated relevant requirements for environmental Life Cycle Assessment (life cycle impacts) in Article 4.1 of the ASI Performance Assurance Manual. The Entity has formulated the Control Procedures for Identification and Evaluation of Environmental Aspects, and has developed and implemented Policies, Systems and Processes that meet these LCA information requirements. The Policy states that the Entity will publicly release the LCA information. The LCA on aluminium strip has not been available for the time being.
4.2 Product design	Minor Non-Conformance	The Entity has stipulated relevant requirements for product design in Article 4.1 of the ASI Performance Assurance Manual. The Entity has formulated the Control Procedure for Design and Development, and established LCA procedures during the product design process. Energy, consumption, emissions to water, emissions to air, waste and other environmental impacts should be considered in LCA. At present, there is no target set for LCA factors in the design process. Regarding new products or product lines and upgrades of existing products or product lines, the Entity has not considered adopting materials or process technologies to improve tolerance to scraps while maintaining the performance and quality of materials.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has set up clear targets for Process Scrap, which are distributed to each Process and reviewed on a monthly basis.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has stipulated relevant requirements for Aluminium Process Scrap (targets) in Article 4.4 of the ASI Performance Assurance Manual.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	The Entity has stipulated relevant requirements for Collection and recycling of Products at end-of-life in Article 4.4 of the ASI Performance Assurance Manual.
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	The Entity has established formal Policies and Procedures for recycling its own aluminium, and set a clear target for the aluminium recovery rate from the final Product. At present, the scrap recycling target is 100%, of which 60% is recycled for remelting and 40% is recycled for second sales.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has stipulated relevant requirements for disclosure of GHG emissions and energy use in Article 5.1 of the ASI Performance Assurance Manual. The Entity conducts verification activities on GHG emissions every year, and publicly discloses important GHG emissions and the use of various energy sources. It also publishes the total GHG emissions regularly every year, including the methods used for GHG emissions and energy use (according to its sources), and publicly discloses its energy use and GHG emissions in the form of GHG Emission Report and GHG Emission Reduction Plan through its website http://wanji-al.bce206.lyqingfeng.cn .
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has provided the GHG Emission Reduction Plan 2020, specifying specific deadlines for actions and implementation, as well as responsible personnel and production domain. However, we note that the Entity still has room for improvement, i.e., it should further mention the GHG emission reduction targets explicitly on the public website, so that the public is well aware of the existence of emission reduction targets.
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	Minor Non-Conformance	As stated in the permit for Emissions to Air in the Entity's "Emission Permit": (there are 9 vents, allowable limit for organised emission, allowable condition for fugitive emission, allowable limit/no allowable limit in special case), after the Entity's Emissions to Air are tested by a Third Party, the

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		organised emission is lower than the Standard limit, and the fugitive emission meets the requirements of emission Standard of Circular on the Recommended Emission Limits in Special Treatment of Volatile Organic Compounds of Industrial Entities in Henan Province. We found at the site that the name and number of the vent for Emissions to Air in the Entity's Emission Permit were inconsistent. For example, the finished Product annealing vent #3 should correspond to the cold rolling oil mist recovery vent #1.
6.2 Discharges to Water	Minor Non-Conformance	The Entity discharges water pollutants according to the "Discharge Permit" (one discharge port, discharge permit limit), and discharges the treated high-concentration ionised water to Xin'an County No.2 Sewage Treatment Plant. It is also provided with online testing facilities networked with local environmental protection departments to monitor the discharge data in real time. The Entity has formulated the Reduction Plan for Discharges to Water, specifying the annual targets for reducing discharges to water and the measures to achieve these targets, excluding the responsible departments, the target date and the completion of the measures.
6.3a Assessment and Management of Spills and Leakage (assessment)	Minor Non-Conformance	The Entity, in accordance with the requirements of the Control Procedures for Identification and Evaluation of Environmental Aspects, has assessed the main risk areas that may pollute air, water and land by spills and leakage in production operations during identification of environmental aspects and environmental Impact Assessment, to identify emergencies where spills and leakage may exist. At the same time, the Entity has formulated the Emergency Plan for Abrupt Environmental Accidents (which was received and filed by Xin'an County Environmental Protection Bureau on 17 July 2020), with a total of 8 abrupt environmental accidents (6 at workshop level and 2 at factory level). However, so far the Entity has not rehearsed the Emergency Plan once a year according to the requirements of the Emergency Plan, but only rehearsed the disposal of Waste diatomite on 11 December 2019.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has never had a spill accident. The Entity entrusts a Third Party (Luoyang Liming Testing and Service Co., Ltd.) every year to test the soil (aluminium foil, finishing, tank farm, sewage treatment, upwind direction and downwind direction /1#~3#) in the plant area, all of which meet the screening value class II of Soil Environmental Quality Risk Control Standard for Soil Contamination of Development Land GB36600-2018.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has stipulated relevant requirements for Reporting of Spills (immediate disclosure) in Article 6.4 of the ASI Performance Assurance Manual. The Entity has never had a spill accident.

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6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has stipulated relevant requirements for Reporting of Spills in Article 6.4 of the ASI Performance Assurance Manual. The Entity has never had a spill accident.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has stipulated relevant requirements for Waste management and reporting in Article 6.5 of the ASI Performance Assurance Manual. The Entity has formulated the Waste Management Procedure and Hazardous Waste Management Plan to collect and dispose of all wastes, as well as the Plan for Reducing the Hazard of Hazardous Waste and Measures for Reducing the Discharges and Hazard of Hazardous Waste. The competent authority will follow up the plans and measures on a quarterly basis.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has stipulated relevant requirements for Waste management and reporting in Article 6.5 of the ASI Performance Assurance Manual, and formulated Waste Management Procedure according to the Waste management strategy designed by Waste Mitigation Hierarchy. The Waste management strategy includes sustainable and comprehensive Control measures to mitigate the adverse effects caused by Waste generation, management (including storage and handling), treatment, transportation and disposal. The Entity has published through the website at: http://wanji-al.bce206.lyqingfeng.cn , accessible to everyone.
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 Entity engages a qualified Third Party to conduct assessment of hydrological characteristics and regional water supply when conducting the environmental Impact Assessment for the construction project. According to the assessment, the water source meets the legal requirements. Xin'an Bureau of Water Resources approves the Water Intaking License.
7.1b Water assessment (risk assessment)	Conformance	The Entity has stipulated relevant requirements for water assessment in Article 7.1 of the ASI Performance Assurance Manual, and formulated the Water Management Program. The Entity analyses the water quality weekly in terms of PH value, hardness, alkalinity, chloride, concentration ratio and conductivity, etc., and no significant change is found.
7.2a Water management (management plans)	Conformance	The Entity has formulated an annual goal of continuously reducing water consumption and a plan to achieve the goal, as shown in the 2017 - 2019 Corporate Water Management Goal and Plan. In 2018, the water consumption per ton of Products was 1.78 m ³ / ton, and in 2019, 1.75 m ³ / ton. It is estimated that the water consumption per ton of Products will be reduced to 1.6 m ³ /ton by the end of 2020.
7.2b Water management (monitoring)	Conformance	The Entity has formulated an annual goal of continuously reducing water consumption and a plan to achieve the goal. Economic analysis meetings are held monthly to monitor the implementation of the plan.

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7.3 Disclosure of water usage and risks	Conformance	Information is published by the Entity on the website of the Group Company and includes water use risks. As the Entity's production water is recycled without discharge after being treated by the wastewater treatment station, there is no risk of pollution.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	According to the environmental greening monitoring in the Monitoring Report on Environmental Protection Acceptance for Construction Project Completion conducted by a qualified Third Party and the Biodiversity Assessment Report in 2019 issued by the Entity, the Entity is not located in any conservation area.
8.2a Biodiversity management (Biodiversity Action Plans)	Conformance	The Entity's Biodiversity Assessment Report, including the biodiversity improvement plan, is approved by the General Manager of the Entity.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity Assessment Report, including the biodiversity improvement plan, is advanced based on the action plan, implementation details and schedule.
8.2c Biodiversity management (reporting)	Conformance	These requirements are published by the Entity on the website of the Group Company: Wanji Holding Group Co., Ltd. - News - Notice (Luoyang Wanji Aluminium Processing Co., Ltd. - Environmental Protection Publicity).
8.3 Alien Species	Conformance	The Entity has stipulated relevant requirements for Alien Species in Article 8.3 of the ASI Performance Assurance Manual, including evaluating and controlling risks of Alien Species, which are accidentally introduced by the Entity through operational activities.
8.4a Commitment to No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.4b Commitment to No Go+in World Heritage properties (existing operations)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (Policy)	Conformance	The Entity has stipulated relevant requirements for Human Rights Due Diligence in Article 9.1 of the ASI Performance Assurance Manual, and formulated the Human Rights Due Diligence Procedures. The Entity promises to respect Human Rights and establish a Human Rights Policy of respecting the civil rights of employees and eradicating discrimination.
9.1b Human Rights Due Diligence (Process)	Conformance	The Entity provides 40 copies of Social Responsibility Questionnaire, and respondents include the managers and grass-roots personnel of the Entity. The contents of the questionnaire include but are not limited to: i) whether there is Forced Labour; ii) whether there is discrimination; iii) whether wages are paid according to laws and regulations; and iv) whether the working and living environments of Workers are safe and hygienic.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has stipulated relevant requirements for Human Rights Due Diligence in Article 9.1 of the ASI Performance Assurance Manual, and formulated the Human Rights Due Diligence Procedures, which stipulates the methods of identifying, preventing, mitigating and explaining the actual and potential impacts of the Entity's actions on Human Rights. During the Human Rights Due Diligence, if it is found that adverse Human Rights impacts have been caused or contributed to, the Entity will make the remediation through legal procedures.
9.2 Women's Rights	Conformance	The Entity has stipulated relevant requirements for women's rights and interests in Article 9.2 of the ASI Performance Assurance Manual, and formulated the Procedures for the Protection and Management of Female Employees. Implementation of the Procedures can ensure respect for women's rights and interests, eliminate discrimination against women, and guarantee women's Human Rights equal with those of men, including the right to vote and stand for election, the right to health, equal access to education, decision-making role in the Entity, equal pay for equal work, protection from sexual abuse and equal opportunities to compete, etc.
9.3 Indigenous Peoples	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as no cultural and sacred heritage is affected by the Entity.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, as no cultural and sacred heritage is affected by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement is necessary, no local residents are affected by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity has stipulated relevant requirements for Local Communities in Article 9.7 of the ASI Performance Assurance Manual, and formulated the Related Party Management Program. The Entity respects legal and traditional rights and interests of Local Communities in their land, livelihood and use of natural resources, and takes appropriate steps to prevent and solve adverse impacts of its activities on the livelihood of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has stipulated relevant requirements for Local Communities in Article 9.7 of the ASI Performance Assurance Manual, and formulated the Related Party Management Program. There is no conflict in land use, customs and other aspects between the Entity and the surrounding villages.
9.7c Local Communities (livelihoods)	Conformance	The Entity has stipulated relevant requirements for Local Communities in Article 9.7 of the ASI Performance Assurance Manual, and formulated the Related Party Management Program. The Entity is closely related to the surrounding Communities, and 90% of its employees are local. The Entity has developed plans to support surrounding Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has stipulated relevant requirements for Conflict-Affected and High-Risk Areas in Article 9.8 of the ASI Performance Assurance Manual, including that the Entity shall not contribute to armed conflicts or violations of Human Rights. The Entity conducts annual inspections to determine whether there are business operations or direct raw Material suppliers in conflict-affected or High-Risk areas. The Entity undertakes not to engage in conflicts directly or through its own business relationships. It will conduct Due Diligence and risk assessment if its raw Materials come from relevant regions.
9.9 Security practice	Conformance	The Entity has stipulated relevant requirements for security practices in Article 9.9 of the ASI Performance Assurance Manual, and formulated the Security Code to establish the importance of respecting Human Rights, boundaries of security activities, Procedures for dealing with security issues and conflicts, and consequences of any violation of Human Rights. Security personnel must act in accordance with the laws and regulations of the state and the government, and shall not be suspected of violating Human Rights while securing the property of the Entity. The Entity conducts Due Diligence on Human Rights activities organised by security personnel at regular intervals.

CRITERION	RATING	COMMENT
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects employees' right to Collective Bargaining. Labour Unions at all levels, in accordance with national laws and regulations, negotiate and sign collective contracts with the Entity on behalf of employees on matters such as labour remuneration, working hours, rest and vacation, labour safety and health, vocational training, insurance and welfare.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity has stipulated relevant requirements for Freedom of Association and right to Collective Bargaining in Article 10.1 of the ASI Performance Assurance Manual, and formulated the Management Program of Freedom of Association and Right to Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	When the Freedom of Association and right to Collective Bargaining of Labour Unions are restricted by local laws, the Entity allows Workers to freely choose their own labour representatives. When necessary, the Entity is obliged to assist each department in electing its own employee representative who is responsible for supervising and raising safety and health, welfare and ASI social management issues to the management.
10.2a Child Labour (minimum age)	Conformance	In the 2019 Survey Report on Social Responsibility Management, the Entity announces that the employment of Child Labour is not allowed. The Entity eliminates the employment of Child Labour and juvenile Workers in accordance with the Labour Law.
10.2b Child Labour (hazardous)	Conformance	The Entity has stipulated relevant requirements for Child Labour in Article 10.2 of the ASI Performance Assurance Manual, and formulated the Management Program of Child Labour and Juvenile Workers. The Entity promises not to place juvenile Workers in an unsafe or dangerous environment for their physical and mental health and development, and it ensures that juvenile Workers work in a safe and hygienic environment. Dangerous Child Labour shall not be arranged (for example, juvenile Workers shall not be arranged in work with higher risks and affecting health and safety, such as generator operation and handling.), and the worst forms of Child Labour shall not be allowed.
10.2c Child Labour (worst forms)	Conformance	The Entity has stipulated relevant requirements for Child Labour in Article 10.2 of the ASI Performance Assurance Manual, and formulated the Management Program of Child Labour and Juvenile Workers. The Entity promises not to place juvenile workers in an unsafe or dangerous environment for their physical and mental health and development, and it ensures that juvenile workers work in a safe and hygienic environment. Dangerous Child Labour shall not be arranged (for example, juvenile workers shall not be arranged in work with higher risks and affecting health and safety, such as generator operation and

CRITERION	RATING	COMMENT
		handling.), and the worst forms of Child Labour shall not be allowed.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour.
10.3c Forced Labour (Migrant Workers)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour.
10.3d Forced Labour (Debt Bondage)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is neither involved in Forced Labour, nor asks for deposit.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is neither involved in Forced Labour, nor restricts Workers' freedom of movement in the workplace or on-site housing.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour. The Entity does not hold any original Documents of Workers, such as ID cards, passports or qualification certificates, but only keep copies of ID cards and graduation certificates in their personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour. The time for dissolving the labour contract is stipulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity announces in the 2019 Survey Report on Social Responsibility Management that an effective monitoring mechanism shall be established according to industry-related international conventions, laws and regulations to ensure the implementation of the Principle of Non-Discrimination in all Business Activities.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity encourages employees to participate in the ASI Management System and establishes direct contact with employees and representatives of the Work Safety Management Committee. The Entity provides a well-developed feedback and communication mechanism and smooth channels for respondents.
10.6 Disciplinary practices	Conformance	The Entity does not tolerate any form of punishment and harassment. It requires its suppliers to abide by the Code of Conduct. Disciplinary practices are determined according to the law, with the participation of employee representatives. All disciplinary records need to be confirmed by employees and the management.
10.7a Remuneration (living wage)	Conformance	The Entity has stipulated relevant requirements for Remuneration in Article 10.7 of the ASI Performance Assurance Manual, and formulated the Salary Management Program. The Standard wage paid by the Entity to employees is by no means lower than the minimum Standard specified by the local government, and the wage earned by employees is sufficient to meet their basic needs and pay household expenses. The current wage paid by the Entity conforms to the statutory Standards and meets the basic needs of Workers.
10.7b Remuneration (method of payment)	Conformance	The Entity has stipulated relevant requirements for Remuneration in Article 10.7 of the ASI Performance Assurance Manual, and formulated the Salary Management Program. The Entity does not unreasonably deduct wages for disciplinary purposes, and stipulates that wages are paid once a month to ensure that wages are not deducted for disciplinary purposes and that wages and benefits are fully consistent with all Applicable Laws. Wages and benefits are paid in a form that is convenient for employees.
10.8 Working Time	Conformance	The Entity has stipulated relevant requirements for Working Time in Article 10.8 of the ASI Performance Assurance Manual, and formulated the Working Time Management Program. The Entity abides by the Applicable Laws and industry Standards on working hours and public holidays, and the Standard working hours in a week (excluding Overtime) does not exceed 40 hours according to the law.

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Minor Non-Conformance	The Entity has stipulated relevant requirements for Occupational Health and Safety (OH&S) Policy in Article 11.1 of the ASI Performance Assurance Manual. The Entity has obtained OHSAS18001:2007 Certificate issued by ZHONGQIAN ZHIHUAN Certification Centre. It is confirmed by this Audit that the Entity's ISO18001 Audit is Equivalent to ASI's requirements in this Article, conforming to the requirements. On-site interview with some employees: They failed to answer the questions. The
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CRITERION	RATING	COMMENT
		training in Occupational Health and Safety Policies should be strengthened so that all employees can correctly understand and implement them.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity has established sufficient and effective management manuals and Procedures to ensure that all employees and related parties comply with internal OHSMS rules, including induction training for new employees, regular physical examinations and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Minor Non-Conformance	The Entity has stipulated relevant requirements for Occupational Health and Safety (OH&S) Policy in Article 11.1 of the ASI Performance Assurance Manual. The Entity has identified and formulated the List of Applicable Laws, Regulations and Other Requirements on Environment and Occupational Health and Safety, including Compliance evaluation. However, it is found that some newly promulgated legal Standards have not been included in the above list, such as the Law on Prevention and Control of Environmental Pollution by Solid Waste (revised on 29 April 2020 and implemented on 1 September 2020) and the Occupational Exposure Limits for Hazardous Agents in the Workplace Part 1: Chemical Hazardous Agents (GBZ 2.1-2019); on the other hand, some included laws and regulations are old versions, such as the Law of the People's Republic of China on the Protection of Minors (revised in 2012 and released on 26 October 2012) and Detailed Rules for the Implementation of the Law of the PRC on the Prevention and Control of Atmospheric Pollution (1 July 1991) (abolished).
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established, implemented and operated the Occupational Health and Safety Management System (OHSMS), and enforced relevant laws and regulations, including the right to stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity establishes OHS Control Procedures, including special operations, occupational disease Control and emergency drills, which meet applicable domestic and international Standards. However, it is found in the production wastewater treatment station that the storage places of chemicals, such as demulsifier, industrial acid, polyacrylamide (PAM) and polyaluminium chloride (PAC), lack MSDS safety technical specifications and corresponding fire fighting facilities. The management of the door signs for oil depots (hot rolling oil, barrelled machine oil/gear oil, etc.) should be standardised. The safety operation rules of diesel refilling machines and the site Management System of Hazardous Waste storage are affixed but inconsistent with the actual inventory Materials. The Management Manual for three Systems implemented on 15 March 2016 is provided on site. It is stamped with "Controlled", but is actually an invalid Document, which is not controlled in accordance with the Document Control Procedures.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has sufficient and effective mechanisms to collect Workers' feedback on Occupational Health and Safety. Above mechanisms include suggestion boxes, employee representative conferences and irregular Workers' interviews.
11.4 OH&S performance	Minor Non-Conformance	The Entity has stipulated relevant requirements for OH&S performance in Article 11.4 of the ASI Performance Assurance Manual. The Entity conducts occupational health evaluation every year, monitors and evaluates the exposure concentration of harmful factors in the Entity's production workplaces to determine whether it can meet the requirements of the existing exposure limit of factors. It also takes effective remedial measures and improvement measures in accordance with the recommended measures in the Occupational Health Evaluation Report to continuously improve the OH&S performance. However, according to the requirements of the Regulations on Supervision and Administration of Occupational Health in Work Places, the occupational-disease-inductive factors shall be tested at least once a year, and the current situation of occupational hazards shall be evaluated at least once every three years. Checking the Evaluation Report on Current Situation of Occupational Hazards dated September 2018 and the Noise Detection Report dated 8 January 2020, the detection of harmful factors such as carbon dioxide, high temperature and power frequency electric field cannot be provided.

Document Control and Version History

Revision	Date	Notes
0	29 September 2020	Issued (Initial Certification)