
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**YUNNAN HAOXIN
ALUMINUM FOIL
CO., LTD**

CERTIFICATE
NUMBER

133

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV RHEINLAND
CERT GmbH

DATE OF ISSUE

7 JULY 2021

DATE OF EXPIRY

6 JULY 2024

CERTIFIED SINCE

7 JULY 2021

AUTHORISED BY

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

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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

Aluminium re-melting, refining and semi-fabrication
activities associated with the manufacture of
aluminium foil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Yunnan Haoxin Aluminum Foil Co., Ltd
ENTITY NAME	Yunnan Haoxin Aluminum Foil Co., Ltd
CERTIFICATION SCOPE	Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of aluminium foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">23 – 25 March 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 April 2021
AUDIT SCOPE	<p>The audit scope included the aluminium re-melting, refining and semi-fabrication associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <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:

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- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 7 July 2021 – 6 July 2024

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 6 July 2022

CERTIFICATE NUMBER 133

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established procedures to collect applicable legal law/regulation. The legal, EHS and human resources departments are charged with the collection and assessment (at least once per year) of applicable law covering labour, ethics, health and safety and environment sections.</p> <p>One qualified law officer and one full-time qualified lawyer are hired to assist the update and assessment of applicable law.</p>
1.2 Anti-Corruption	Conformance	<p>Business ethics policies and procedures are established, including anti-extortion and bribery, and training is provided to employees. The ethics reporting channel is posted in the meeting room and canteens. A due diligence investigation on high risk positions in the Entity, such as the purchasing department, sales, quality, warehouse, requires all staff in these departments to sign an Honesty Commitment Letter. Internal audit on ethics is conducted at least once per half year.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established an ASI Policy and related procedures consistent with the ASI Performance Standard and provides training to Workers periodically. The Entity has communicated the Code of Conduct to their Suppliers and requires signing of an ASI Performance Standard Commitment Letter. The Entity's ASI Policy is included in the Sustainable Development Report 2020:</p> <p>https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established a Management System including an ASI Policy on environmental, social and governance compliance. The Entity's ASI Policy is included in the Sustainable Development Report 2020:</p> <p>https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Strong commitment to implement the ASI Management System is established by the top management team of the Entity. The effectiveness of the system is reviewed during annual management reviews.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, posts on site and publishing on the Entity's website: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
2.2 Leadership	Conformance	The General Manager has been appointed as the management representative for ensuring the ASI social, environmental and governance requirements are reflected by the Entity. The authorities and responsibilities of the role are defined in the appointment letter. An ASI Team is also established to support the ASI Management System implementation.
2.3a Environmental and Social Management Systems (environmental)	Conformance	An Environmental Management System has been established and implemented.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an ASI Management System, which covers the social management system. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity is highly committed to responsible sourcing. Responsible sourcing is implemented by the Entity through signing ASI Commitment Letters, supplier assessments and emphasis on suppliers to implement ASI Performance Standard requirements. The responsible sourcing policy is available on the website: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html However, the Entity does not implement the Supplier and Sub-Contractor Management Procedure effectively, with some suppliers not managed according to the internal procedure, with no commitment letter signed or assessment conducted.
2.5 Impact Assessments	Conformance	The Entity has assessed impact regarding environment, health and safety, social responsibilities and communities regularly.
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected stakeholder groups, Emergency Response Plans are established, well implemented and training provided periodically.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger or acquisition control procedure, including due diligence process before a merger or acquisition. In the past 3 years, there has been no merger or acquisition in the Entity.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closures, decommissioning and divestment control procedure in accordance with requirement of the ASI Performance Standard. No such event has occurred since the ASI Management System commenced, or in the past 3 years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Sustainable Development Report 2020 is published on the website: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliance and liabilities. Non-compliance issues are publicised in the Sustainable Development Report 2020, page 9: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html The Entity has taken corrective action on the non-compliance.
3.3a Payments to governments (legal and contractual)	Conformance	The Financial Audit Report 2019, issued by a qualified third party, identified that payments to government by the Entity are only those legally required and there are no other payments. The Entity has disclosed the payments to governments in the Sustainable Development Report 2020: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
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	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. The communication channels (telephone, email) are made public to internal and external stakeholders and are included in the Sustainable Development Report 2020, page 8: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed and implemented policies and processes for LCA (life cycle assessment). At the time of audit, the Entity had drafted an LCA

CRITERION	RATING	COMMENT
		report for the two products of aluminium plate and foil. However, the assessment does not cover the process differences for product variations, for example, the energy consumption of different thickness of foil should be different.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented policies and processes for LCA (life cycle assessment). The policies state it could provide the LCA upon customers' request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented policies and processes for LCA (life cycle assessment), including public communication. The policies state it will publish access to LCA information.
4.2 Product design	Minor Non-Conformance	The Entity has established procedures for LCA (life cycle assessment) in the product design process where the LCA shall consider various environment impacts including energy consumption, water, air emission and waste. At present, in design phase all the environment factors of LCA have been identified and listed in the final design reports, however, no quantificational data for each factor has been 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% of scraps are recycled by the internal smelter workshop. The scraps generated rate is reviewed at the monthly management meeting to ensure targets are on track.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a scrap and dross classification and management procedure to classify and dispose of the different kinds of aluminium scraps. All the scraps are classified in alloy separation and disposed by different smelters. Related records are kept for review.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	The ASI System Manual defines a strategy for collection and recycling of aluminium products at end-of-life. The collection and recycling data are kept by material system. However, the strategy does not include clear targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	The ASI System Manual defines the facility shall try to improve the reuse rate of aluminium. At present, the facility has signed recycling contracts with customers to collect the scraps of products at end-of-life and related recycling records are kept. However,

CRITERION	RATING	COMMENT
		the Entity does not monitor the recycling rate in the products and there is no detailed program to improve the reuse rate of aluminium for products at end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published GHG emission data on the website: https://ylgf.chinalco.com.cn/xwzx/ywgg/202105/t20210519_80655.html The GHG calculation covers all the potential sources.
5.2 GHG emissions reductions	Conformance	The Entity plans to reduce CO ₂ emissions by 1% for 2021 against 2020 data and has developed improvement programs covering direct and indirect emission sources to achieve the target. At present, the major GHG generation sources are electricity and natural gas. The management team annually reviews the progress. All the energy data is tracked and reviewed monthly. The GHG reduction plan is available on the website: https://ylgf.chinalco.com.cn/xwzx/ywgg/202105/t20210519_80655.html
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	The Entity has established an air emission inventory for all air emission sources for all outlets. The Entity requires qualified third parties to monitor the outlets according to the monitoring plan in the PDP (Pollution Discharge Permit). The Entity is not a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for air emission discharge. The Entity sets reduction targets for major indexes such as sulfur dioxide and non-methane hydrocarbon annually and targets are tracked and reviewed by management team annually. To achieve the targets, the Entity implements improvement programs to reduce waste air emissions. The Entity has published air emission data in the annual Sustainable Development Report, page 15:

CRITERION	RATING	COMMENT
		<p>https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html</p> <p>However, the monitoring frequency is not consistent with PDP requirements, waste air from the lab is not treated prior to discharge and waste air treatment system maintenance is not implemented according to internal procedures.</p>
6.2 Discharges to Water	Minor Non-Conformance	<p>The Entity has established a wastewater inventory to control the discharges to water. All the industrial wastewater is collected and treated by a wastewater treatment plant (WWTP) owned and managed by the parent company, Yunnan Aluminum Co., Ltd (not covered by this audit) prior to discharging to the local municipal WWTP, managed by government. The Entity monitors wastewater quarterly and no excessive results have been detected. The Entity is not a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for the water discharge. The Entity has established a continual reduction plan for wastewater discharges and all improvement programs are tracked. Wastewater management information is incorporated in the annual Sustainable Development Report, page 15 -16:</p> <p>https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html</p> <p>However, wastewater from the lab, which contains acid waste, is discharged to the domestic wastewater system rather than the industrial wastewater treatment system. As the amount of wastewater generated from the lab is less than 1% of total wastewater, there is no significant impact to the concentration of final discharge.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity conducts regular spill and leakage assessments. No high risk situations are identified and the Entity has taken preventive action or implemented improvement programs for the potential risks identified.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>The Entity conducts leakage assessments every 3 years, the latest in February 2019. No high risk situations are identified and the Entity has taken preventive action or implemented improvement programs for all the potential risks. Emergency response programs for spills and leakage are established and registered with the local environment bureau. No spills have occurred in the past years and spill drills have been conducted annually.</p>

CRITERION	RATING	COMMENT
		However, the spill and leakage prevention actions for hazardous substances are not adequate for chemical storage. For example, there is no way to detect leakage from underground oil tanks; there is no secondary container for flammable chemicals in lab; the leakage collection pool for the waste oil warehouse is less than the maximum storage volume.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Emergency Environment Issue Response Program defines how to dispose of and report spills. If there is spill, the ERT (Emergency Response Team) would follow the response process to deal with it accordingly, and spill drills are conducted annually to ensure the process is up to date.
6.4b Reporting of Spills (regular reporting)	Conformance	No spills have occurred in the past years. Emergency Environment Issue Response Program defines how the Entity will report spills to the local authorities and impacted units, to other people immediately and will disclose it in the annual Sustainable Development Report.
6.5a Waste management and reporting (strategy)	Conformance	Solid waste and hazardous waste management regulation defines processes to collect and dispose of all waste. All hazardous waste is transferred to qualified third parties according to legal requirements. Inventory and disposal receipts are kept for review. The Entity has established continual improvement targets to reduce the waste generation and targets are reviewed annually by the senior management team. The Entity has established a labelling system for the hazardous waste and all containers have been posted with legal standard labels.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has incorporated waste management information including waste categories, quantity and disposal in the annual Sustainable Development Report, pages 16 – 17: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
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.

CRITERION	RATING	COMMENT
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 (state 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	Scrap and dross classification and management procedure defines adequate and effective process to collect and recycle the aluminium dross. Prior to being sent to specialised vendors, the Entity has a process to recycle the aluminium internally, at present about 20% of aluminium dross is recycled.
6.8b Dross (recycling)	Conformance	The final aluminium dross is recycled and refined by smelters which are owned by Yunnan Kaixin Industry and Trade Co., Ltd. It is used as a material rather than as waste and the final waste is sold to another factory (Yunnan Wenshan Aluminium Co., Ltd) which transfers the dross to aluminium oxide which is used by the electrolysis process.
6.8c Dross (review of alternatives)	Conformance	The Entity has monthly reviews of dross recycling management to seek improvement programs to reduce the final dross. The aluminium dross is recycled by smelters owned by the parent company (Yunnan Aluminum Co., Ltd). It is used as a material rather than waste and the final residue is sold to another factory which transfers the dross to alumina as material of electrolysis. There is no landfill of dross residue waste.

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7.1a Water assessment (mapping)	Conformance	The Entity has assessed the water consumption by a qualified third party through the environment impact assessment reports when the facility was founded, which indicated the water source is compliant with legal requirements and approved by the local bureau. The Entity has established water mapping and regularly reviews the updates and changes.
7.1b Water assessment (risk assessment)	Conformance	The Entity conducts water risk assessments annually and the result is low risk.
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce 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 monthly.
7.3 Disclosure of water usage and risks	Conformance	The ASI System Manual defines the policy and procedure on how to publish water management information. The water management and control programs have been published in the annual Sustainable Development Report, pages 15 – 16: https://ylgf.chinalco.com.cn/whyzr/shzr/202105/t20210514_80409.html
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A biodiversity assessment is covered by EIA (Environment Impact Assessment) reports which are conducted by a qualified third party. The Entity is located within a government managed industrial zone which is not a protected area. There is no evidence to show the Entity has a negative impact on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity cooperates with the parent company (Yunnan Aluminum Co., Ltd) to establish the biodiversity action plans annually. The plans include revegetating mountains to prevent loss of soil and expanding the vegetated area in factory areas.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established action plans for biodiversity management and the plans are consultative and designed in accordance with the biodiversity mitigation hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported its biodiversity management and outcomes via a Biodiversity Risk Assessment Report available on the website:

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		https://ylgf.chinalco.com.cn/xwzx/ywgg/202105/t20210519_80660.html
8.3 Alien Species	Conformance	The Entity annually assesses 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 mines)	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 for compliance with human rights in the ASI Management Manual. The Entity identifies the risk of human rights and provides 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 is not implemented effectively and at the time of audit a human rights due diligence had not been conducted for seven suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity establishes and publishes the complaints/grievance channel to stakeholders. No adverse impact is reported and no remedy is needed.
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 providing sufficient protection to pregnant workers and nursing mothers.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	As confirmed through the environmental impact assessment report, no cultural and sacred heritage is affected by the Entity.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	The resettlements management procedure has been established. As confirmed through the environmental impact assessment report, no resettlement is necessary.
9.6b Resettlements (where unavoidable)	Conformance	The resettlements management procedure has been established. As confirmed through the environmental impact assessment report, no resettlement is necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity hires some employees from the local communities. The Entity has established plans to support the surrounding communities.
9.7b Local Communities (impacts)	Conformance	The Entity is within an industrial park, the nearest communities are 1.5km away. A number of employees are from the local area. The Environmental Impact Assessment report indicates the facility has installed environmental protection devices, such as air emission treatment facilities, to reduce the impact to the surrounding communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a number of employees from the local communities. The Entity has established plans to support the surrounding communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established an ASI Management Manual, which includes the Entity's commitment to not contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas. Through internal investigation from the due diligence investigation reports as well as the supplier signed commitments, it was found that no material has come from conflict-affected and high-risk areas.
9.9 Security practice	Conformance	The security at the Entity is provided by the parent company (Yunnan Aluminum Co., Ltd). The Entity has established an ASI Manual and Security Code of Conduct to respect human rights. All security staff are trained on the human rights policy and procedure, including anti-harassment, anti-abuse and anti-forced labour. All security practices respect 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. There are 41 elected Workers' Representatives and an Association for Workers was established in the Entity.

CRITERION	RATING	COMMENT
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 and to participate in any collective bargaining process.
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.
10.2a Child Labour (minimum age)	Conformance	No child labour (under 16 years) or young workers (aged 16 to 18) are used by the Entity.
10.2b Child Labour (hazardous)	Conformance	No child labour (under 16 years old) or young workers are used by the Entity. If any young workers are used, they are given special protection and are not allowed to work in hazardous working environments.
10.2c Child Labour (worst forms)	Conformance	No child labour (under 16 years) or young workers are used by the Entity. If any young workers are used, they are given special protection and are not allowed to work in hazardous working environments. 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 was 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 and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in forced labour. No foreign migrant workers are used by the Entity, all workers are Chinese. The Entity does not hold workers in debt bondage nor force them to work in order to pay off a debt.
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.

CRITERION	RATING	COMMENT
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 a policy and procedure on anti-discrimination during the hiring, promoting and training processes.
10.5 Communication and engagement	Conformance	The Entity encourages workers to participate in the ASI Management System, and direct and frequent communication with workers and the representatives of the Worker Councils is established. Interviewed workers provided feedback on a positive working environment and direct communication.
10.6 Disciplinary practices	Conformance	As per the ASI Management Manual, the Entity does not tolerate any form of punishment and harassment. Suppliers are required to comply with the policy and procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. All disciplinary records need to be confirmed by workers and management.
10.7a Remuneration (living wage)	Minor Non-Conformance	Wages are in compliance with legal standard and meets the basic needs of workers. All the employees are enrolled in the social insurance and housing fund. Moreover, the Entity has provided supplemental retirement insurance to all workers. However, an isolated issue was identified where no public holiday wage was paid to 1 of the 30 sampled worker records from February 2021.
10.7b Remuneration (method of payment)	Conformance	Payments are documented and submitted to employees' bank accounts according to contract and legal law, no delay in payment occurred in the past 12 months.
10.8 Working Time	Minor Non-Conformance	The Entity has established a procedure to provide the payment of annual, sick, marriage, maternity leave, etc to workers. Working hours are recorded and monitored. The weekly working hours, total working hours do not exceed the legal requirement or industry standards. However, 7 out of 60 sampled worker records from September and December 2021 did not have 1 day off in every 6 days.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
1.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued

CRITERION	RATING	COMMENT
		regarding the Occupational Health and Safety (OH&S) Policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued regarding the application of the Occupational Health and Safety (OH&S) Policy to workers and visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued regarding the commitment to comply with applicable law and standards in the Occupational Health and Safety (OH&S) Policy.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued regarding the right to stop unsafe work in the Occupational Health and Safety (OH&S) Policy.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. The findings all 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 ISO 45001 audit are still observed during this audit. For example, the Entity does not effectively control the PPE (Personal Protection Equipment) expiry dates, lift work and hot work.
11.3 Employee engagement on health and safety	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued regarding employee engagement on health and safety.
11.4 OH&S performance	Conformance	The Entity has ISO 45001:2018 certification. The certification body conducted a supervision audit for the Entity in November 2020 and a total of 3 minor findings were issued. There was no finding issued regarding occupational health and safety performance.

Revision	Date	Notes
0	7 July 2021	Initial Certification Audit (Full Certification)