
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ANHUI MAXIMUM ALUMINIUM INDUSTRIES CO., LTD.

CERTIFICATE
NUMBER

104

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

11 DECEMBER 2020

DATE OF EXPIRY

10 DECEMBER 2023

CERTIFIED SINCE

11 DECEMBER 2020

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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CERTIFICATION SCOPE

Anhui Maximum Aluminium Industries Co., Ltd.
located in No. 88, Yinghua West Road, Suixi
Economic Development Zone, Anhui Province,
China.

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Maximum Aluminium Industries Co., Ltd.
CERTIFICATION SCOPE	Anhui Maximum Aluminium Industries Co., Ltd. located in No. 88, Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">• 9 – 10 October 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 9 November 2020
AUDIT SCOPE	<p>Anhui Maximum Aluminium Industries Co., Ltd. is located in No. 88, Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and main production processes include remelting and casting, cold rolling and finishing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Material Conversion (Production and Transformation) <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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- 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 11 December 2020 - 10 December 2023

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 10 December 2022

CERTIFICATE NUMBER 104

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity holds valid ISO 14001:2015 and OHSAS18001:2017 Certificates. The management process for identification and assessment of ASI-related Legal requirements and other requirements is established, implemented and maintained. The Legal Compliance register is used to identify and maintain relevant information. The compliance evaluation is conducted once a year, and the result is recorded. In the internal audit and management review meeting, the compliance status of the legal and other requirements has been reviewed. The training demands for ASI-related requirements are identified and the associated training courses are provided to employees. More information of Legal Compliance assessment could be found in the Sustainability Report via the link below:</p> <p>http://www.maxalu.com/upload/file/20200930/20200930113103.pdf.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented the policy and procedures to manage Anti-Corruption, e.g. Management Procedure of Anti-Corruption, Management Procedure for Gift and Entrainment etc., The Entity has developed and implemented the whistler-blowing mechanism (suggestion box, hot line: 0561-7976888, mailbox: 273308686@qq.com), Declaration of conflict of interest etc. The whistle-blowing channel is published to the employees and the interested parties.</p> <p>For employees in high-risk positions of corruption, relevant anti-corruption training has been provided and implemented. And these employees are required to sign the letter of Anti-Corruption Commitment. All employees are required to report the providing/receiving gifts from the business partners.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity implemented adequate measures, including training and communication to raise awareness about the code among business partners and suppliers. The relevant information is available for all interested Stakeholders on the Entity's website:</p>

CRITERION	RATING	COMMENT
		http://www.maxalu.com/upload/file/20200928/20200928222018.pdf .
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.maxalu.com/upload/file/20200928/20200928231747.pdf .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented policies. And the policies and procedures are reviewed and updated on a regular basis. The Entity holds valid ISO14001 and OHSAS18001 Certificates.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are available for internal and external Stakeholders by training, post on-site and publishing on the website. The policies can be found via the following link: http://www.maxalu.com/upload/file/20200928/20200928231747.pdf .
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 Certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Social Management System. And holds a valid ISO 45001:2015 and OHSAS18001:2007 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.
2.4 Responsible Sourcing	Conformance	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 suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on Responsible Sourcing requirements. The purchasing policies can be accessed via the

CRITERION	RATING	COMMENT
		following link: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf .
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are implemented in accordance to the ASI and relevant legal requirements. 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.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and OHSAS18001: 2007 Certificates. Emergency Response Plans are 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 its establishment in 2011.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for Closure, Decommissioning and Divestment has been established in accordance to the requirement of the ASI Performance Standard. But no such case has happened since its establishment in 2011.
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.maxalu.com/upload/file/20200930/20200930113103.pdf .
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 the 2019 Sustainability Report. Disclosures can be found via the following link: http://www.maxalu.com/upload/file/20200930/20200930113103.pdf .
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

CRITERION	RATING	COMMENT
		contractual basis. The payment to government is listed in the finance report which is audited by the third party.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Internal and external Whistle-blowing/Complaint/Grievance mechanism exist (e.g. whistle blower hotlines, mail address, suggestion box). Pls. find it on the Entity's Policy for Responsible Purchasing that can be accessed via the following link: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf .
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.maxalu.com/upload/file/20201013/20201013132434.pdf .
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided cradle-to-gate Life Cycle Assessment (LCA) information for its Aluminium Product. The Environmental Life Cycle Assessment is developed and documented: http://www.maxalu.com/upload/file/20201013/20201013132434.pdf .
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment Report is published on the website of the Entity: http://www.maxalu.com/upload/file/20201013/20201013132434.pdf . Public communications on LCA include public access to the LCA information and its underlying assumptions including system boundaries.
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. Per the product development process, the energy-consumption, the use of clean energy, waste reduction and recycling shall be taken into consideration at the stage of product development. Systems documentation related to product design

CRITERION	RATING	COMMENT
		include objectives covering resource efficiency, recyclability, scrap tolerance etc.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and where the generated target is 100% of scrap for collection, recycling or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity implements a separation of 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 how to improve the recycling rate of products at end-of-life. Currently, the customers return the non-conforming products to the Entity for re-work or cutting into a small size for re-use. The generated target for Process Scrap utilization rate is 100%.
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 gas emissions and energy use by source are tracked, calculated and documented annually. Refer to section 2 of the 2019 GHG emissions Report. This information can be accessed via: http://www.maxalu.com/upload/file/20201013/20201013132328.pdf . The GHG emission is not checked by a third party.
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emission reduction target towards 2020, which should reduce the GHG emission by 0.5% 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 reduce the gas consumption. Refer to section 2-3 of the GHG emission reduction target. This information can be accessed via: http://www.maxalu.com/upload/file/20201013/20201013132328.pdf .

CRITERION	RATING	COMMENT
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 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. However, the monitoring report on cooking fumes from the kitchen is not available.
6.2 Discharges to Water	Conformance	Discharges to Water is covered and managed within the Environmental Management System. The Entity setup water reduction targets and established a related plan to minimize adverse impacts. The monitor reports of wastewater show major pollutants were monitored and the 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 of Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and Management of Spills and Leakage is defined in the Environmental Management System. Major Spills and Leakages will be handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spill/Leakage is defined in Environment Emergency Preparedness and Response Management Procedure. No spill/leakage happened in 2019. The information can be accessed on page 12 of the 2019 Sustainability Report via: http://www.maxalu.com/upload/file/20200930/20200930113103.pdf .
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spill/leakage and remediation actions taken will be published in the annual sustainability Report. No spill/leakage happened in 2019. The information can be

CRITERION	RATING	COMMENT
		accessed on page 12 of the 2019 Sustainability Report via: http://www.maxalu.com/upload/file/20200930/20200930113103.pdf .
6.5a Waste management and reporting (strategy)	Minor Non-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 compliance with the legal compliance, all hazardous wastes are transferred to the qualified suppliers for disposal. Each transfer is registered in the specific website of the Environment Protection Ministry. The transfer in 2019 is audited. However, the inventory and transfer records for waste rolling oil are not available.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposals Information in the Waste Management Report in 2019 and published this on the official website: http://www.maxalu.com/upload/file/20201021/20201021113533.pdf .
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)	Conformance	The Aluminium taken from the Dross pressing will be recycled into the melting furnaces of Anhui Maximum Aluminium Industries Co., Ltd. The rest part is sold to the outside Dross processors for further extracting the remaining Aluminium, which can be used to produce Aluminium alloying ingots and air conditioner parts materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the Dross pressing will be recycled into the melting furnaces of Anhui Maximum Aluminium Industries Co., Ltd. for recycling Dross residue. The rest part is sold to the outside Dross processors for recycling Dross residue, which can be used to produce Aluminium alloying ingots and air conditioner parts materials.
6.8c Dross (review of alternatives)	Conformance	There is no Dross residue sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legally 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 Areas 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 report is published on Water Inventory Map, please see:

CRITERION	RATING	COMMENT
		http://www.maxalu.com/upload/file/20200930/20200930122358.pdf , and water risks assessment report is published in section 2-3 of the Assessment Report of Water-Related Risks, please see: http://www.maxalu.com/upload/file/20200928/20200928232215.pdf .
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 Anhui Maximum Aluminium Industries 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). Further information, please see section 1-2 in the Biodiversity Risk Assessment Report: http://www.maxalu.com/upload/file/20200928/20200928232310.pdf .
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.
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, all pallets are fumigated before using to prevent introduction of Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.

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PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Policy's commitment to respect Human Rights is set up and communicated to all employees. The policy is accessible via: http://www.maxalu.com/upload/file/20200928/20200928231747.pdf .
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. Per the risk assessment report, the risks on Human Rights are identified and assessed, the major risks are on supply chain. The ASI Code of Conduct of the Entity is clearly communicated with major suppliers through conformance letter signing, on-line training. 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 is established and implemented. The onsite audits are performed on 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. Per the Audit Reports of suppliers' ASI Audits, no adverse case is reported. On the Internet, no negative news is found on the Entity's Human Rights and its major suppliers.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected by the Entity. The Entity has implemented policies and processes to ensure respect for the rights and interests of women, consistent with international Standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy is in place and is communicated to all employees including women Workers through on-site notice, training. No complaint is received from women Workers. Women Workers state they know their rights.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples within the Entity's Area of Influence.

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9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	There are no Cultural and sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	There is no project causing resettlement in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	There is no project causing resettlement in the history of the Entity.
9.7a Local Communities (rights and interests)	Not Applicable	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. However, it is located in an industrial zone, without any Local Community around it.
9.7b Local Communities (impacts)	Not Applicable	The Entity is located in an industrial zone, without any Local Community around it.
9.7c Local Communities (livelihoods)	Not Applicable	The Entity is located in an industrial zone, without any Local Community around it.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment towards 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 conflict minerals; Until now, no complaint on this issue is received.
9.9 Security practice	Conformance	Defined in the Contract signed between the Entity and the security Workers, the Policies and Procedures state the Entity's commitment and approach to security activities that respect Human Rights: no body search is permitted and work shall occur in humane ways. The training is provided to security guards to ensure all security understands their tasks and the way to respect Human Rights. No grievance or complaints against security activities is received till now.
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 demonstrates they respect the right to Freedom of Association and to Collective Bargaining. The Entity commits itself to respect the Workers' rights. There is one Worker

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		committee of 10 Worker representatives including 4 women.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity respects the rights of Workers to Freedom of Association and Collective Bargaining. There are laws that restrict Collective Bargaining in China. Although there are no Collective Bargaining Agreements in the company, the Entity has a Policy of respecting rights related to Freedom of Association and Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws that restrict Freedom of Association and Collective Bargaining in China. However, the Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining. Workers' representatives can deal with the Workers' concerns with management on behaviours of Workers. The Workers interviewed know how to complain or to report their concerns.
10.2a Child Labour (minimum age)	Conformance	The Entity establishes a Policy on Child Labour prohibition. The age of the candidate is verified by checking the ID cards and an interview. There is no Child Labour or any young Workers in the company. The youngest Worker on site was 23 years old.
10.2b Child Labour (hazardous)	Conformance	There is neither Child Labour, nor any young Workers in the Entity. The Entity establishes the management procedure to protecting young Workers (16 to 18 years) in compliance with the local legal requirements and to not allow the 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 neither Child Labour, nor any 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 throughout 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

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		<p>suppliers on this issue to guarantee no Forced Labour happens internally and throughout the supply chain.</p> <p>No case of Human trafficking is reported or heard of.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. It is verified by a Worker & management interview and by reviewing pay rolls. None of the employees is required to fulfil any form of deposit, recruitment fee or equipment at any stage of employment.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers in the company, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity prohibits any form of Forced Labour, does not provide any forms of loans to Workers. In the labour contracts signed between the Entity and Workers, between the labour agency and 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 move freely when needed to access basic liberties, such as going to the toilet, drinking water. They can go to external medical facilities when they are not feeling 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 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. The resigned Workers 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

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		decisions are solely based on the candidate's ability to perform as per the job's requirements rather than on other personal characteristics. The interviewed Workers confirm they feel treated equally 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 Workers. 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	Pay slips reviewed indicate wages are not deducted for disciplinary reasons. All interviewed Workers know the disciplinary measures, know how to appeal if they think it is unfair.
10.7a Remuneration (living wage)	Minor Non-Conformance	The wage structure is clearly defined, the basic wage meets the legal minimum wage. The total payment meets the Workers' basic needs. However, one Minor Non-Conformance is issued related to social insurance.
10.7b Remuneration (method of payment)	Conformance	Wages payment is documented and timely paid to all Workers by bank transfer on the 15th of the following month. The detailed information of wages, allowance, overtime work compensation, deduction can be mentioned on payslip.
10.8 Working Time	Conformance	Working hours are recorded by manual record. The regular Working Time is 40 hours a week, 5 days for office staff. For Workers at a workshop, there are 3 groups for 2 shifts. Working hours are monitored, total working hours did not exceed the legal limit set in the overtime approval of 2432 hours a year, at least one day off per seven days 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 is Certified against OHSAS 18001:2007. The periodical audit against OHSAS 18001:2007 was performance based, no Major

CRITERION	RATING	COMMENT
		Non-Conformance was raised in the audit, and 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.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The health & safety Policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance 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 that are relevant to them and the right to refuse unsafe work. The Entity has measures to protect Workers from undue consequences for doing so.
11.2 OH&S Management System	Minor Non-Conformance	The site has implemented a documented OHSAS 18001:2007 Management System and holds a valid OHSAS 18001:2007 Certificate. However, for occupational diseases, Workers indicated that when being diagnosed with a condition during occupational health examinations, no timely actions were taken.
11.3 Employee engagement on health and safety	Conformance	In compliance with the requirements of Clause 4.4.3 of OHSAS 18001:2007, the Entity has a system of ' consultation and participation in health & safety. The workers are encouraged to report their concerns or advices on OH&S issues by themselves or by the worker representative, the management responds the concerns and advices on OH&S issues from workers.
11.4 OH&S performance	Conformance	Four Health and Safety Targets and improvements are set up and documented in Occupational Health and Safety Program. The implementation plans are established and implemented. The achievement status of the targets is monitored periodically. Currently, the implementation of the management programs for the OH&S targets is on track.

Document Control and Version History

Revision	Date	Notes
0	11 December 2020	Initial Certification Audit