
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

C.S. ALUMINIUM CORPORATION

CERTIFICATE
NUMBER

70

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

10 FEBRUARY 2020

DATE OF EXPIRY

9 FEBRUARY 2023

CERTIFIED SINCE

10 FEBRUARY 2020

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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

C.S. Aluminium Corporation (CSAC) located in Hsiao Kang, Kaohsiung, Taiwan. The main products cover aluminium plates, rolls, sheets and foil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	C. S. Aluminium Corporation
ENTITY NAME	C. S. Aluminium Corporation
CERTIFICATION SCOPE	C.S. Aluminium Corporation (CSAC) located in Hsiao Kang, Kaohsiung, Taiwan. The main products cover aluminium plates, rolls, sheets and foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/Refining, Casthouses, Semi-Fabrication, Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">18 November 2019 – 21 November 2019 (First Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 December 2019 (First Certification Audit)
AUDIT SCOPE	<p>C.S. Aluminium Corporation (CSAC) manufactures and sells aluminium plates, rolls, sheets and foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing.</p> <p>C.S. Aluminium Corporation (CSAC) has four production facilities, Melting & Casting Department, Rolling Mill-I Department, Rolling Mill-II Department and Foil Mill Department. Headquarters and four facilities are all located at No.17 Tung Lin Rd., Hsiao Kang, Kaohsiung 81260, Taiwan.</p> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

10 February 2020 - 9 February 2023

NEXT AUDIT
TYPE

Surveillance audit

NEXT AUDIT
DUE DATE

10 August 2021

CERTIFICATE
NUMBER

70

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has established procedure to collect the applicable legal law/regulation, the legal department is charged for the legal law/regulation collection and assessment at least once per year, cover the legal law on labour, ethics, health & safety and environment sections. But the Entity does not update the training plan for new workers training and refresh training to cover all requirements based on ASI PS standard.
1.2 Anti-Corruption	Conformance	The Entity has established the ethics policy/procedure, covered the anti-bribery and corruption. The risk assessment on the ethics was conducted once per year. The ethics reporting channel was communicated through the official website and supplier compliance commitment agreement. Entity has conducted the due-diligence investigation on the high risk positions in the facility, such as purchase, sales, quality, design departments. Entity provides training on ASI performance standards, covering the ethics policy and procedures.
1.3 Code of Conduct	Conformance	The Entity has established their code of conduct against the ASI performance standard, and provide training to management and workers annually. Entity has communicated their code of conduct to stakeholders and suppliers through the official website and supplier compliance commitment agreement.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established management system on environmental, social and governance compliance based on the CSAC Governance, Environmental and Social performance Assurance Manual. The Entity has obtained the ISO 14001:2015 Environmental Management Systems and OHSAS 18001 Occupational Health and Safety Systems certificate.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Management representative is appointed for labour, ethics, health & safety, environment. The responsibility was defined in the appointment letter. Strong commitment management to the implementation of the management systems.

CRITERION	RATING	COMMENT
		The effectiveness of the system is reviewed during the annual management review.
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	Entity has established CSAC Governance, Environmental and Social performance Assurance Manual according to ASI performance standard, including the policies and procedures. However, the policy about ASI compliance is not issued to outside stakeholders. https://www.csalu.com.tw/CSR/index.htm .
2.2 Leadership	Conformance	The Industrial Safety General Manager has been appointed as management representative for labour, ethics, health & safety, environment, the responsibility was defined in the appointment letter.
2.3a Environmental and Social Management Systems (environmental)	Conformance	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 established management system on social compliance based on the CSAC Governance, Environmental and Social performance Assurance Manual (Sections 9-11), including management provisions for preventing and mitigating these identified main environmental, social and occupational health and safety impacts.
2.4 Responsible Sourcing	Conformance	The Entity is highly committed to responsible sourcing. Responsible sourcing is implemented through supplier assessments and emphasizing on its suppliers to implement ASI standards.
2.5 Impact Assessments	Conformance	The Entity has assessed impacts regarding environment, health and safety based on risk assessment of ISO14001 and OHSAS18001, impacts regarding social responsibility including human rights through Social Management Questionnaire, which in line with ASI requirements.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity has adequate and effective emergency response plans (ERP). This includes crisis organization, communication guidelines and business recovery plans. Emergency response team (ERT) has been established and been trained annually. However, the Entity has not established the emergency response

CRITERION	RATING	COMMENT
		program for potential community, labour and human right emergency incident.
2.7 Mergers and Acquisitions	Conformance	The Entity has established CSAC Governance, Environmental and Social performance Assurance Manual, which include the procedure for mergers and acquisitions, but no such activity has happened in past 3 years.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established CSAC Governance, Environmental and Social performance Assurance Manual, which include the procedure for Closure, Decommissioning and Divestment in accordance to the requirement of ASI Performance Standard. But no such case has happened since operation start.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the sustainability reporting requirements. The Entity publicly discloses its governance approach and Sustainable Development Report: https://www.csalu.com.tw/CSR/index.htm
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliances and liabilities. The Entity publicly discloses its governance approach and Sustainable Development Report: https://www.csalu.com.tw/CSR/index.htm
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these anti-corruption requirements. This requirement is covered, through Transparency and Anti-corruption policies' deployment. https://www.csalu.com.tw/CSR/int.htm
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Internal and external Whistle-blowing/ Complaint/Grievance mechanisms exist (e.g. whistle blower hotlines, mail address, and suggestion box).

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these life cycle assessment (LCA) requirements. The facility has established a plan to finish LCA for all products. During the audit, LCA for one product (aluminium plate) has been finished according to the plan and the LCA report show the defined procedures and process are followed accordingly. However, the LCA for other products has not been finished till the audit date.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these LCA information requirements. The policies claim it will provide LCA upon request. However, because the Entity only finished the LCA for one product, it could not provide LCA information to customers at present, the assessment is still in progress.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these LCA information requirements. The policies claim it will provide LCA upon request. However, because the Entity only finished the LCA for one product, it could not provide LCA information to customers at present, the assessment is still in progress.
4.2 Product design	Minor Non-Conformance	The Entity has established procedures for LCA in products design process, the LCA shall consider various environment impacts including energy consumption, water, air emission and waste. At present, GHG has been integrated into the design process. However, due to the Entity only finished the LCA for one product, LCA could not be implemented in the design process and no target regarding the LCA factors is set up.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and improvement programs for each process to reduce scraps during production. All the scraps are recycled by internal smelter workshop. The scraps generated rate is reviewed by management meeting monthly to ensure the targets are in not off track.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a Scraps Management Procedure to classify and dispose the different kinds of aluminium scrap. All scrap is classified in alloy separation and disposed by different smelters. Related records are kept well for review.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has set 5-year-strategy for recycling of products at end-of-life. Clearly targets and improvement programs are established. The yearly targets are reviewed monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has formal policy and procedures for the internal aluminium recycling. All the recycled products have been dealt by internal smelter workshop. The Entity has clear target for the rate of recycled aluminium in final products. The recycled aluminium is comprised of internal scraps, re-smelter aluminium and scraps from customers.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published the GHG (Green House Gas) data in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw The GHG calculation is performed by qualified third party.
5.2 GHG emissions reductions	Conformance	The Entity is planning to reduce CO2-emission by 1% per year and has made improvement programs covering direct emission sources and indirect emission sources to achieve the target. The management team annually reviews the progress. All the energy data is tracked and reviewed monthly. The reduction plan is published in annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw .
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

CRITERION	RATING	COMMENT
6.1 Emissions to Air	Conformance	<p>The Entity has established air emission inventory for all the air emission sources and obtained PDP (Pollution Discharge Permit) for all the outlets. The Entity has required qualified third party to monitor the outlets according to the frequency requirements in PDP. The Entity has set continually reduction targets for particle, sulfide, oxynitride and VOCs (volatile organic chemicals) from 2011 to 2018, the targets are tracked and reviewed by management team annually. To achieve the targets, the Entity has implement improvement programs to reduce the waste air emission. The Entity has published the air emission data in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw.</p>
6.2 Discharges to Water	Minor Non-Conformance	<p>The Entity has established wastewater inventory to control the discharges to water. All the industrial wastewater is collected and treated by internal WWTP (wastewater treatment plant) prior to discharging to local municipal WWTP which is managed by government. The Entity has established online monitoring system for the final outlets and required qualified third party to monitor the control indexes quarterly. The Entity has established continual reduction plan for the wastewater discharging and all the improvement programs are in tracking.</p> <p>The wastewater information has been published in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw. However, there still is room to improve the management of wastewater monitoring, partial legal required indexes such as ferric, manganese and anionic surfactant are not monitored.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>Procedure of Hazards and Spill Control for Hazardous Chemicals clearly defines the procedure on how to manage the spill and leakage including annually conduct spill and leakage assessment. The Entity has conducted leakage assessment annually and the latest assessment for wastewater is finished in February 2019 and that for waste air in January 2019.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>Procedure of Hazards and Spill Control for Hazardous Chemicals clearly defines the procedure on how to manage the spill and</p>

CRITERION	RATING	COMMENT
		leakage. The Entity has conducted leakage assessment annually and the latest assessment for wastewater is finished in February 2019 and that for waste air in January 2019. No high risk is identified and the Entity has taken preventive actions for all the potential risks. However, leakage risk still exists in special areas such as WWTP (wastewater treatment plant). For example, nearby the OWT station, wastewater residue is observed around the stormwater inlets and the Entity does not take measures to prevent the residue being washed into stormwater system.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has clear defines how to dispose and report spills in the Accident Identification and Response Management Procedure and Procedure of Hazards and Spill Control for Hazardous Chemicals. If there is spill or leakage, the emergency response program will be started and the ERT (Emergency Response Team) will follow the procedure accordingly. The Entity has conducted spill drill annually to ensure ERT members are familiar with the procedures. if any spill exists, the Entity will report the spills to local authorities and impacted units and people immediately and disclose it in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw .
6.4b Reporting of Spills (regular reporting)	Conformance	No any spill exists in the past years. The Entity will report the spills to local authorities and impacted units and people immediately and disclose it in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw
6.5a Waste management and reporting (strategy)	Conformance	Waste Management Procedure defines the processes to collect and dispose all the waste and the Entity has continual improvement targets to reduce the waste generation per unit. The targets are reviewed quarterly by management team.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has published the waste management information in the annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw .

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
Not Applicable	Conformance	Scraps Management Procedure defines process to collect and recycled the aluminium dross. Prior to be sent to professional vendors, the facility has 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 by a sister factory of the Entity. It is used as a material rather than as waste.
6.8c Dross (review of alternatives)	Conformance	The Entity has monthly reviewed the dross recycling management to seek improvement programs to reduce the final dross. The final aluminium dross is recycled by a sister factory of the Entity. It is used as a material rather than as waste and so no any landfilling of dross residue exits.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has assessed the water consumption and established water mapping, which indicated the water source is compliant with legal requirements and approved by local bureau.
7.1b Water assessment (risk assessment)	Minor Non-Conformance	The Entity has conducted water risk assessment annually according to Environment Impact Factors Risk Assessment Procedure, however, the water risk assessment does not concern the impacts from water suppliers and water disposal contractors
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce the water consumption and has established programs to achieve the targets according to Environment Management Manual requirements.
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 according to Environment Management Manual requirements. The senior management team quarterly reviews the targets and improvement programs to ensure they are not off track.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Environment Management Manual defines how to publish the water management information and it has been published in annual CSR (Cooperate Social Responsibility) report which is available in https://www.csalu.com.tw . The published information includes water management and control programs, However, the published information is not adequate, information regarding which risks are identified and how to prevent them are not included.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted biodiversity assessment annually. The Entity is not located at a government managed industrial zone which is not protected area. No any evidence shows the Entity has negative impact to the biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	According to the biodiversity assessment, the Entity has no risk of impact to the biodiversity and so no action plan is required.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	According to the biodiversity assessment, the Entity has no risk of impact to the biodiversity and so no action plan is required.
8.2c Biodiversity management (reporting)	Conformance	According to the biodiversity assessment, the Entity has no risk of impact to the biodiversity and so no action plan is required and so no publishing is required.
8.3 Alien Species	Minor Non-Conformance	The Entity has annually assessed the risks of alien species and taken control measures for the high risks. However, there is still room to improve the effectiveness of assessment, such as concerning the potential sources of transportation.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity commits the whole group in its CSAC Governance, Environmental and Social performance Assurance Manual compliance with human rights. https://www.csalu.com.tw/CSR/csrp.htm
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has the process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights through Social Management Questionnaire, and no negative issue found. The Entity identifies the risk of human rights and provides the trainings for all employees.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity commits the whole group in its CSAC Governance, Environmental and Social performance Assurance Manual compliance with human rights. An externally communicated helpline exists https://www.csalu.com.tw/contact.asp . The

CRITERION	RATING	COMMENT
		elected worker representation is the main contact for all complaints and topics from workers.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected, including equal rights in gender, voting and being elected, education, employment, promotion, Maternal health, etc. regulated by CSAC Governance, Environmental and Social performance Assurance Manual. No complaint is received on from women workers.
9.3 Indigenous Peoples	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable, there are no Indigenous Peoples in the areas where the Entity operates.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established ASI Performance Assurance Manual, and respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaint from the local communities is received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with local communities. All its employees are from the local communities. The Entity supports several social initiatives of the local communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established CSAC Governance, Environmental and Social performance Assurance Manual and does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Through internal investigation, no materials come from Conflict-Affected and High-Risk Areas.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The security is provided through own staff from enterprise. Staff is trained on the ASI performance standard and has to comply with it.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits the whole group in its CSAC Governance, Environmental and Social performance Assurance Manual to respect the workers' rights, including respect the rights of workers to associate freely in Labour Unions, seek representation and join workers councils without interference to the extent possible under applicable law, in line with the ILO conventions C87 and C98.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of workers to collective bargaining, participate in any collective bargaining process in good faith to the extent possible under applicable law and adhere to collective bargaining agreements. The collective bargaining agreement is available in the Entity, which signed on 21 August 2017 with 3 years valid period.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for workers, and worker council exist in the Entity.
10.2a Child Labour (minimum age)	Conformance	The Entity neither engages in or tolerates the use of Child Labour as defined in ILO Conventions C138 and C182, and is complying with related national and international law: A basic minimum working age of 15 years.
10.2b Child Labour (hazardous)	Conformance	The Entity does not support any kind of child labour. Young workers are under special protection by Labour Standards Law and not allowed to work in hazardous working conditions
10.2c Child Labour (worst forms)	Conformance	The Entity is not involved in or supporting Worst Forms of Child Labour. The Entity commits itself, and expects its contractors, to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established ASI Performance Assurance Manual, commits itself and expects its contractors to comply with the prohibition of forced labour, slavery and human trafficking. No type of forced labour is found in the Entity.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity is not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies. All employees are employed directly, no deposits, fees, or advances required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in forced labour. Workers are all local citizens. The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not require migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in forced labour. No deposits or security payments are permitted. The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not hold workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is no restriction of workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is no restriction of workers' movement at the sites.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The time for announced termination of the working contract is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-discrimination. No case of discrimination has been received.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity encourage workers to participant in the ASI management system, direct and frequent communication with workers and the representatives of the worker councils. Positive working climate and direct communication were mentioned by interviewed persons.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of involved worker.
10.7a Remuneration (living wage)	Conformance	The wage is in compliance with the legal standard, and meets the basic needs of workers.
10.7b Remuneration (method of payment)	Minor Non-Conformance	All payments are documented and submitted twice per month to the Entity employees' bank accounts, which fully compliance with the legal requirement. However, the Entity does not conduct the regular check about the Human Right to the sub-contractors within the Entity boundary, especially for the overtime wage payment calculation.
10.8 Working Time	Conformance	Working hours are recorded through electronic attendance system effectively. Working hours and rest days are monitored and in compliance with legal requirement.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has established formal policies for OHS and posted in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has adequate and effective policies and procedures to ensure all workers and visitors follow internal OHS rules, including orientation training and regular monitoring.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has established formal policies for OHS including legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has established formal policies for OHS including right to stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has established adequate and effective procedures on OHS control.
11.3 Employee engagement on health and safety	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has adequate and effective mechanisms to collect workers' feedback on OHS. The mechanisms include suggestion boxes, worker representative meeting and irregular worker interview, accident/injury analysis. Related records are kept well since the founding.
11.4 OH&S performance	Conformance	The Entity has obtained effective OHSAS18001:2007 certificate (Certificate Number: OHS585188, Issue Body: BSI, Valid Date: from 7 April 2018 to 11 March 2021) covering the whole certified scope. The Entity has targets for accident/injury on OHS and the targets are reviewed quarterly.

Document Control and Version History

Revision	Date	Notes
0	10 February 2020	Issued (Full Certification)
1	29 March 2021	Revised criterion 4.3b to 'conformance to reflect what was initially reported in the elementAI audit report.