
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**KUNSHAN
ALUMINIUM CO.,
LTD**

CERTIFICATE
NUMBER

74

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

26 FEBRUARY 2020

DATE OF EXPIRY

25 FEBRUARY 2023

CERTIFIED SINCE

26 FEBRUARY 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

Kunshan Aluminium's facility at No 269, Nijiabang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province

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	Kunshan Aluminium Co., Ltd.
ENTITY NAME	Kunshan Aluminium Co., Ltd.
CERTIFICATION SCOPE	Kunshan Aluminium's facility at No 269, Nijiang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">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	DNV GL
AUDIT DATE	<ul style="list-style-type: none">23 December 2019 – 24 December 2019 (First Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">15 January 2020 (First Certification Audit)
AUDIT SCOPE	<p>Kunshan Aluminium Co., Ltd.'s business scope includes the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products. The company was registered in July 2004 with a registered capital of 443.8 million RMB and a total investment of 960 million RMB. The company's double zero aluminium foil design capacity of 35,000 tons / year, product width of 1920mm, products include food, cigarettes, medicine, daily necessities, cosmetics and other high-end packaging foil and high-grade foil for the electronics industry.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">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

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

26 February 2020 - 25 February 2023

NEXT AUDIT
TYPE

Surveillance audit

NEXT AUDIT
DUE DATE

25 August 2021

CERTIFICATE
NUMBER

74

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Kunshan Aluminium Co., Ltd. has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Kunshan Aluminium Co., Ltd. has systems in place to maintain awareness of and to ensure compliance with applicable law.
1.2 Anti-Corruption	Conformance	Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent corruption are implemented and personnel trained in these processes as verified through training records. The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. The Entity also has a Policy for Labour and Business Ethics: http://akscn.net/KunLvInfo.aspx?Infold=372
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity implemented adequate measures, including training, communication to raise awareness of the code among business partners and suppliers. The Code of Conduct is available for all interested stakeholders on the official website of the Entity: http://akscn.net/KunLvInfo.aspx?Infold=372
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. The Entity has developed and implemented systems, procedures and processes that conform to the environmental, social, and governance policies requirements. For further details, please see: http://akscn.net/KunLvInfo.aspx?Infold=372
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented policies. The Entity has endorsement and support from

CRITERION	RATING	COMMENT
		senior management in order to provide sufficient resources for regular review of policies, meeting ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are available for internal and external stakeholders by training, publishing on website and post on-site. http://akscn.net/KunLvInfo.aspx?Infold=372 .
2.2 Leadership	Conformance	A Senior Management representative has been nominated and there is a team including HR, EHS, quality and purchasing staffs to support him to implement the ASI standards.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an Environmental Management System in place and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems has been established and implemented. Social and 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 are part of the Entity's Policy for Labour and Business Ethics, accessible via the following link. http://akscn.net/KunLvInfo.aspx?Infold=372
2.5 Impact Assessments	Conformance	The Entity has procedures and systems in place to conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. The entity clearly demonstrates a proactive and inclusive approach with key stakeholders both internally and externally when facing major changes and projects. There are not new projects or major changes to existing nominated facilities since 2004.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and OHSAS 18001 certificates. The Entity has well-established emergency response plans developed in collaboration with potentially affected stakeholder groups such as communities, workers and their representatives, and relevant agencies. The Emergency Response Plans on Social, OH&S and Environmental Incidents are well implemented and personnel trained as 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 the site started the operation in 2004.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment has been established in accordance to the requirement of ASI Performance Standard. But no such case has happened since 2004.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual sustainability report, published on the website of Kunshan Aluminium Co., Ltd. http://akscn.net/KunLvInfo.aspx?Infold=372
3.2 Non-compliance and liabilities	Conformance	The Entity publicly disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2018 sustainability report. http://akscn.net/KunLvInfo.aspx?Infold=372 Per the official websites of the relevant government agencies and NGOs, one fine for missing registration of one special equipment is raised by the relevant government agencies in June 2019, the non-compliance issue is corrected in August 2019 by the Entity.
3.3a Payments to governments (legal and contractual)	Conformance	The payment to government is listed in the finance report which is audited by the 3rd party. The Entity only makes, or have made on its behalf, payments to governments on a legal and/or contractual basis.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
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). Please find it in Entity's Sourcing Policy: http://akscn.net/KunLvInfo.aspx?Infold=372 .
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The environmental life cycle assessment is conducted and documented. The Environmental Life Cycle Assessment Report is published on the website of the Entity. http://akscn.net/Upload/files/ASI-05.pdf .
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its aluminium product. The Environmental Life Cycle Assessment Report can be provided by external communication if required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment Report is published in the official website of the Entity: http://akscn.net/Upload/files/ASI-05.pdf .
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 products. http://akscn.net/Upload/files/ASI-05.pdf .
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and, where generated target 100% of scrap for collection, recycling. Refer to page 8 of Sustainability Report in 2018Waste on, accessible via the following link: http://akscn.net/Upload/files/ASI-01.pdf .
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	The process scraps generated by the Entity cannot be re-used, the alloy separation is not needed.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	The nature of the product and production process means that the Entity cannot use the recycled material or products.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	The nature of the product and production process means that the Entity cannot use the recycled material or products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The major scope 1, 2 greenhouse gas emissions and energy use by source are tracked, calculated and documented annually. The information can be reached via: http://akscn.net/Upload/files/ASI-08.pdf . The GHG emission is not checked by 3rd party.
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emission reduction target for 2019 and 2020, shall reduce the GHG emission per product based on the level of 2018. The main strategy is to reduce the unnecessary electricity consumption and increase ratio of green energy and electricity generated by nuclear power station. The target and management program are published on: http://akscn.net/Upload/files/ASI-08.pdf .
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity conducted air emission management program with actions/controls to mitigate adverse impacts. The air from the tempering process is collected and emitted from a chimney with the height of 15 meters. The air from the purifying and recycling system of rolling oil is absorbed, collected and emitted from the chimney with the height of 15 meter. The emission meets the local discharge limit.
6.2 Discharges to Water	Conformance	Discharges to water is covered and managed within the environmental management system. The Entity setup water consumption targets and establish related plan to minimize adverse impacts. The monitor report of wastewater in

CRITERION	RATING	COMMENT
		2019 shows wastewater discharge meets 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. The result of the identification and assessment is published on: http://akscn.net/UpLoad/files/ASI-09.pdf .
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 are handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of spill/leakage is defined in Environment protection management procedure. No spill/leakage happened in the past 3 years.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The impact assessments of the spill/leakage and remediation actions taken shall be published in the annual sustainability report. No spill/leakage happened in 2018. However, the information on spill is not disclosed in the published Sustainability Report for the year of 2018. http://akscn.net/UpLoad/files/ASI-01.pdf .
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system. The Entity implemented a waste management strategy according to the waste mitigation hierarchy, The disposal of hazardous waste is compliance with the legal compliance. It is evidenced by the information in the specific website of Environment Protection Ministry: http://218.94.78.90:8080 .
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals information on page 8 of the sustainable development report in 2018 and published in the official website: http://akscn.net/UpLoad/files/ASI-01.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.

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6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The water risk assessment considered the Entity's industrial park, nearby lands and waterways risk in their area of influence. Due to the nature of the product and production processes, and there is a water management system in place, in the local water environment, the level of water-related risk was found to be low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The water usage and risks assessment report is published on section 4-8 of Water-related risk assessment report, Please see http://akscn.net/UpLoad/files/ASI-07.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 the Entity and in the Entity's industrial park, nearby lands and waterways 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 the Biodiversity Risk Assessment Report http://akscn.net/UpLoad/files/ASI-10.pdf .
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.3 Alien Species	Conformance	As per the biodiversity risk assessment report, the only source which could introduce the alien species is the pallets which is wood used for product package. 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.

CRITERION	RATING	COMMENT
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 ASI Policy of the Entity states its commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights. http://akscn.net/KunLvInfo.aspx?Infold=372
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity commits to respect Human Right. The risk assessment process (ASI-1.2-03) is established covering the supply chain and social audits are conducted on the major material suppliers based on the requirement of due diligence process. However, one minor non-conformance is issued on lacking of a human rights evaluation for a catering company and a security company.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its size and circumstances. The Entity establishes and publishes the complaint/grievance channel to stakeholders. Where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it cooperates in their remediation through legitimate processes
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 (refer to the Entity Code of Conduct-ASI-1.3-01) and is communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples is established. No Indigenous Peoples are involved.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples

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		including Free, Prior, and Informed Consent (FPIC) is established. No Indigenous Peoples are involved.
9.5 Cultural and sacred heritage	Not Applicable	Policies and procedure to protect cultural and sacred heritage is established, however, no cultural and sacred heritage is involved
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on resettlement. However, no resettlement or displacement has been conducted by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a procedure on resettlements. However, no resettlement or displacement has been conducted by the Entity.
9.7a Local Communities (rights and interests)	Conformance	Based on the results of the human rights due diligence and a general risk assessment, which was done taking into account the rights and interest of local communities, environment pollution was the only identified adverse impact on the local communities. Plans are implemented to mitigate adverse impacts. The Entity is active in community engagement at all their sites and at a corporate level.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. The control measures for the identified impact on local communities are established and implemented.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with local communities and neighbourhood organizations to improve and support mutual interests. The Entity is active in community engagement at their site and at a corporate level.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is in compliance with the policies related to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity and all suppliers sign the commitment letter to promise not using the conflict mineral.
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect Human Rights in line with ASI standards and good practices. The service agreement between

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		the Entity and the security company and labour contracts of security workers also clearly defines the primary role of security workers which is to protect people, property and or assets and to 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 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 trade union in the site, all the 5 trade union committee members are freely elected by the workers in 2019 which are also worker representatives including 3 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 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; There is one trade union in the site, the trade union and top management hold a meeting once a quarter, trade union can deal with the workers' concerns with management on behave of workers.
10.2a Child Labour (minimum age)	Conformance	There is not child labour or young worker in the company. In China, the minimum working age is 16, the youngest worker in the company is 29 years old. The policy of not using child labour is established.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in China. Young workers are (16 to 18 years) are under special protection by law and not allowed to work in 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.

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10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor tolerates Human Trafficking either directly or through any employment or recruitment agencies. The policy of prohibition of forced labour including human traffic is established and communicated internally and to the suppliers. The Entity commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor tolerates the use of Forced Labour. All employees are hired directly. Workers are not required any form of deposit; recruitment fee or equipment in advance, no any illegal deduction. The training course on forced labour is provided to all employees.
10.3c Forced Labour (migrant workers)	Conformance	No foreign migrant workers in the company, all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in any form of forced labour and does not provide loans or credit to workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in forced labour. The Entity does not unreasonably restrict the freedom of movement of workers in the workplace or in on-site housing. Workers are free to leave the factory when not engaged in work; Workers move freely when needed to access basic liberties, such as go to toilet, drink water, medical treatment.
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	The Entity is not involved in forced labour. The time for announced termination of the employment is in compliance with the Labour Contract Law: 30 days in advance or 3 days in the period of probation.
10.4 Non-Discrimination	Conformance	The Entity has policies and procedures in place that effectively ensure equal opportunities and it does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker.

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10.5 Communication and engagement	Conformance	Regular meeting between trade union and top management of the Entity, grievance and complaint hotline and email, as well as operating procedures ensure open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
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. The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers.
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 need. However, one minor non-conformance is issued related to wages for indirect security workers and cooks.
10.7b Remuneration (method of payment)	Conformance	All payment are documented and timely paid to all workers by bank transfer on or thereabouts the 10th of the following month.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded manually. Working hours are monitored. Three minor non-conformances are issued on working hours records of indirect security workers and cooks are not available for review during the audit, overtime hours of one sampled direct worker exceed legal limit of 36 hours and one sampled pregnant worker is not provided additional one hour break per day when she was pregnant in the first 3 months.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	In compliance with Occupational Management System, Occupational Health and Safety Policy is approved by the top management of the Entity, implemented and reviewed periodically. The policy is published on the official website of the entity and communicated to the employees and stakeholders.

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11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	In compliance with the legal requirements and the requirements of OHSAS 18001:2007, the health and safety of workers and visitors is covered in the scope of the Occupational Health & Safety Management System. The detailed control methods for workers and visitors are defined and implemented.
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.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them and right to refuse the unsafe work.
11.2 OH&S Management System	Conformance	The Entity establishes, implements, maintain and continually improves the documented Occupational Health and Safety management system, get the OHSAS 18001:2007 certification. The last audit was conducted from May 27 to 29, 2019, the certificate keeps valid. The valid status of the OHSAS 18001:2017 certificate can be verified at www.cnca.org.cn . (website of Certification and Accreditation Administration of China).
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of workers' 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	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 H&S targets is monitored every month.

Document Control and Version History

Revision	Date	Notes
0	26 February 2020	Issued (Full Certification)
1	29 March 2021	Revised to correct public headline statements relating to Criteria 9.3, 9.4, 9.5, 9.6a and b.