
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**JIANGSU ZHONGJI
LAMINATION
MATERIALS CO.,
LTD**

CERTIFICATE
NUMBER

37

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

5 AUGUST 2019

DATE OF EXPIRY

4 AUGUST 2022

CERTIFIED SINCE

5 AUGUST 2019

AUTHORISED BY

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

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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

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
CERTIFICATION SCOPE	Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.
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">Initial Certification Audit (12 – 13 June 2019)Surveillance Audit (26 – 27 September 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">12 – 13 June 2019 (Initial Certification Audit)26 – 27 September 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 June 2019 (Initial Certification Audit)13 October 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 13 June 2019)</u> Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.</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> <p><u>Surveillance Audit (26 – 27 September 2021)</u> Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.</p>

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- 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

5 August 2019 – 4 August 2022

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

4 August 2022

CERTIFICATE
NUMBER

37

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard legal compliance requirements. Jiangsu Zhongji Lamination Materials Co., Ltd. has systems in place to maintain awareness of and to ensure compliance with Applicable Law. The relevant training courses are provided to the employees.
1.2 Anti-Corruption	Conformance	The Entity has established the policy and procedures to manage issues on Anti-Corruption, e.g. gift and entertainment policy, whistleblowing mechanism. An Anti-Corruption Commissioner is appointed. Training is provided to the employees with high risk. Per the register of misconduct reported, no corruption case has been reported in the last 3 years.
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 implements adequate measures, including training, communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is published on the Entity's official website at: http://www.zjalufoil.com/ac/59.html
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. For further details, please see: http://www.zjalufoil.com/ac/59.html
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented Policies. The effectiveness of these policies and procedures is reviewed by top management in the annual management review meeting.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, publishing on the website and by posts on-site. More information can be found via the link below: http://www.zjalufoil.com/ac/59.html

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	A senior Management Representative has been nominated. During the interviews, all relevant staff demonstrated a good level of knowledge on sustainability issues.
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. The scope of the external certifications covers the Entity's ASI Certification Scope.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems has been established and implemented. The Entity holds a valid ISO 45001:2018 certificate. During the Surveillance Audit, the effectiveness of the Social Management System was verified.
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 Responsible Purchasing Policy is published on the Entity's official website at: http://www.zjalufoil.com/ac/57.html
2.5 Impact Assessments	Not Applicable	No new projects or major changes have been made since the Entity became an ASI Member.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans on social, occupational health and safety, (OH&S) and environmental accidents are well implemented and trained. The emergency plan related to confined space entry has been established. All employees including the office staff attended the evacuation drill in 2020 and 2021.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened in the past 3 years.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment is established in accordance with the requirement of the ASI Performance Standard. No such activity has happened in the past 3 years.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	The Sustainability Report 2020 is published on the Entity's official website. More information can be found via the link below: http://www.zjalufoil.com/WebEditor/upload/download/20210617025915.pdf
3.2 Non-compliance and liabilities	Minor Non-Conformance	There were no non-compliance or liabilities reported in the Sustainability Report for 2020. On the official websites of relevant government agencies and NGOs, no significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law are raised by the relevant government agencies. However, a Minor Non-Conformance is raised: One air pollutant defined in the Pollution Discharge Permit was not monitored in 2020, and the violation was not reported in the Sustainability Report for the year 2020.
3.3a Payments to governments (legal and contractual)	Conformance	As per the Financial Audit Report 2020 and as verified by a third party audit firm, payments to government are legally required, such as tax. No other payments are reported. The management confirm the Anti-Corruption Policy is followed.
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 Whistleblowing/ Complaint/ Grievance mechanisms exist (e.g. whistleblower hotlines, mail address, suggestion box). Please see: http://www.zjalufoil.com/contact/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Environmental Life Cycle Assessment is conducted and documented.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Environmental Life Cycle Assessment report is published on the Entity's official website at: http://www.zjalufoil.com/WebEditor/upload/download/20210617022450.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment Report is published in the official website of the Entity. More information can be found via the link below: http://www.zjalufoil.com/WebEditor/upload/download/20210617022450.pdf

CRITERION	RATING	COMMENT
4.2 Product design	Minor Non-Conformance	The Entity establishes a process to set out clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. However, a Minor Non-Conformance is raised as no such targets were established in 2020.
4.3a Aluminium Process Scrap (targets)	Conformance	The Process Scrap is collected and packaged, sold to a smelter or other manufacturer of construction materials for recycling. As per the site observation and document review, the recycling rate is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	As per the result of risk analysis, the Process Scrap generated by the Entity does not need separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a recycling strategy with timelines, activities and targets. The production scrap is 100% recycling reuse. The Entity is communicating with its main customers to discuss how to improve the recycling rate of products at end-of-life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Because there are no 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	Greenhouse Gas (GHG) emissions are publicly disclosed in the 2020 GHG Emission Report, published on the official company website: http://www.zjalufoil.com/WebEditor/upload/download/20210617021824.pdf The GHG Emission report is not checked by a third party.
5.2 GHG emissions reductions	Conformance	The Entity established a GHG Emission Reduction Plan for 2018 - 2022, for more information please see: http://www.zjalufoil.com/WebEditor/upload/download/20211027102849.pdf The Entity established a GHG emission reduction target in 2020: to reduce the GHG emission at a level below 0.681 tons CO ₂ -eq per metric ton Aluminium foil. The main strategy is to improve the energy consumption efficiency. For more information, please see:

CRITERION	RATING	COMMENT
		http://www.zjalufoil.com/WebEditor/upload/download/20210617021824.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	Minor Non-Conformance	The Entity has plans to minimise adverse impacts from air emissions. The waste air generated in the operation is collected and treated before emission. However, in 2020, particulate matter emissions were not monitored and the Entity did not meet the requirement of the Pollution Discharge Permit.
6.2 Discharges to Water	Conformance	Discharges to Water is covered and managed within the Environmental Management System. Water discharge meets the local legal 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 in the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Based on the results of risk identification and assessment, the emergency preparedness and response plan for Spills and Leakage of chemicals is established, and includes processes for external communication plans and methods to prevent Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills and Leakage is defined in the Emergency Response Plan. The procedure to disclose significant Spills to all affected parties (such as local community, neighbours) is covered in the Emergency Response Plan. There have not been any significant spills to report since the Entity started the operation at the existing location.
6.4b Reporting of Spills (regular reporting)	Conformance	Impact Assessments of the Spills and Leakage and remediation actions taken are published in the Sustainability Report, section 3, page 6:

CRITERION	RATING	COMMENT
		http://www.zjalufoil.com/WebEditor/upload/download/20210617025915.pdf No Spill or Leakage has occurred in the past 3 years.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System and has been designed in accordance with the Waste Mitigation Hierarchy. The management procedure for Hazardous and Non-Hazardous Waste is established and implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The nature and quantity of Hazardous Waste generated by the Entity is registered in the Solid Waste Information Management System. This information on how to manage Non-Hazardous Waste and the associated waste disposal methods is published in the Sustainability Report, Section 3.2 and 3.3: http://www.zjalufoil.com/WebEditor/upload/download/20190528030430.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.
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.

CRITERION	RATING	COMMENT
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-related risk assessment is conducted covering the Entity's own operation and its Area of Influence. The water source is municipal water supply. Usage is tracked and documented.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are assessed. For more information, please see: http://www.zjalufoil.com/WebEditor/upload/download/20190528030857.pdf
7.2a Water management (management plans)	Not Applicable	The water-related risks were identified and assessed as low risks to the Entity.
7.2b Water management (monitoring)	Not Applicable	The water-related risks were identified and assessed as low risks to the Entity.
7.3 Disclosure of water usage and risks	Conformance	The water-related risk assessment report and Water Balance Map are published on: http://www.zjalufoil.com/WebEditor/upload/download/20210617030955.pdf

PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	A biodiversity impact assessment for the Entity's activities and within its Area of Influence was conducted by a qualified third party and included in the Environmental Management System. The report showed that there were no significant risk and impacts on biodiversity due to the nature of products and the production, and that the Entity is not located or close to any protected areas. The Biodiversity Risk Report is published on: http://www.zjalufoil.com/WebEditor/upload/download/20190613104614.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.
8.2c Biodiversity management (reporting)	Not Applicable	There were no significant risks or impacts to biodiversity from the Entity's operation.
8.3 Alien Species	Conformance	The main carrier medium (pallets made of wood) is processed in a way to avoid the 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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Policy commitment is established, and communicated to all employees. All interviewed Workers state they understand the Policy. Negative information on Human Rights was not found on Internet.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights. The Due Diligence process is established covering the supply chain. The process includes identifying, assessing the risks on Human Rights, and taking actions to prevent, mitigate its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity establishes and publishes the complaints/grievance channel to stakeholders. A remediation process towards any adverse Human Rights impact is in place. No major impacts are reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.
9.3 Indigenous Peoples	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples

CRITERION	RATING	COMMENT
		including Free, Prior, and Informed Consent (FPIC) are established. However, there are no Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Policies and procedures to protect cultural and sacred heritage are established. However, there are no sites of cultural or sacred heritage in the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	Policies and procedures to protect cultural and sacred heritage are established. However, there are no sites of cultural or sacred heritage in the Entity's Area of Influence.
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	As per the risk assessment, environmental pollution is identified as an adverse impact on the local Communities. The Environmental Management System is established to reduce the risk. The Entity holds a valid ISO 14001:2015 certificate. There have been no complaints received from local Communities.
9.7b Local Communities (impacts)	Conformance	As per the risk assessment, environmental pollution is identified as an adverse impact on the local Communities. The Environmental Management System is established to reduce the risk. The Entity holds a valid ISO 14001:2015 certificate. There have been no complaints received from local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with local Communities. More than half of its employees are from the local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not using conflict minerals, and communicates this through the aluminium value chain. As one of its due diligence measures, the Entity and its suppliers sign a commitment letter to not use conflict minerals. As per the risk assessment, there are no materials in products or the production processes from Conflict-Affected and High-Risk Areas.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect Human Rights in line with the ASI Performance Standard and good practice. The interviewed security guard states received training courses on respecting labor rights and job duty and understood. There have been no complaints received on the security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	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 are 60 elected Worker representatives including 11 women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has a policy on respecting rights to freedom of association and collective bargaining. There are no collective bargaining agreements in the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity demonstrates they respect the right to freedom of association and to collective bargaining. Workers' representatives can deal with Workers' concerns with management on behalf of Workers. The interviewed worker representative and workers know the mechanism.
10.2a Child Labour (minimum age)	Conformance	There is no Child Labour or young Workers working in the Entity, the youngest Worker in the Entity was born on Dec. 14, 2002, joined in on July 13, 2021.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. There is no Child Labour or young Workers in the Entity as per review of records and management and worker interviews.
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 no Child Labour or young Workers in the Entity.
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.

CRITERION	RATING	COMMENT
		No case of Forced Labour is reported or heard of in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are hired directly. As per the review of records and management and worker interviews, Workers are not required to provide any form of deposit; recruitment fee or tool fee.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers in the Entity, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide a loan to workers. As per review of records and management and worker interviews, no case for Debt Bondage is found or heard of in the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' movement at the Entity.
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' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Minor Non-Conformance	The Entity is not involved in Forced Labour. The time for announced termination of the employment is in compliance with the Labor Contract Law: 30 days in advance or 3 days in the period of probation. However, one Minor Non-Conformance is raised: the wrong probation period is defined in the signed labour contract of 3 workers in 2021.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. No case of Discrimination has been received. The Workers interviewed felt they are treated equally.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and Worker representatives is established. The communication channels are published and available to all Workers.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of the involved Worker. No inhumane activity is found in the discipline measures.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, the basic wage is above the legal minimum wage. The total payment meets the Workers' basic need.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all Workers by bank transfer on the 15th of the following month. Workers receive their pay-slip on the pay day.
10.8 Working Time	Conformance	Working hours are recorded manually. Working hours are monitored and are in compliance with China Labor Law: regular working hours are 40 hours, 5 days a week; the maximum overtime working hours do not exceed 3 hours a day, 36 hours a month. The total weekly working hours do not exceed 60, one day off in every 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. Please see: http://www.zjalufoil.com/WebEditor/upload/download/20190612015725.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Health and Safety Policy is applied to Workers and Visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Health and 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 the right to refuse the unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 OH&S Management System and holds a valid ISO 45001:2018 Certificate.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirement and OH&S Management System requirement, the Entity has a system of Workers' consultation and participation in health and safety. Worker representatives participate in the health and

CRITERION	RATING	COMMENT
		safety meeting periodically, the management responds to the concerns and advice on OH&S issues from Workers.
11.4 OH&S performance	Conformance	Health and Safety targets and improvements are documented in Occupational Health and Safety Program. For further information, please see the following link, section 2: http://www.zjalufoil.com/WebEditor/upload/download/20210617025915.pdf

Document Control and Version History

Revision	Date	Notes
0	5 August 2019	Initial Certification Audit – Full Certification
1	10 November 2021	Surveillance Audit