
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TIANJIN ZHONGWANG ALUMINIUM CO.,LTD

CERTIFICATE
NUMBER

77

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

22 MARCH 2022

DATE OF EXPIRY

21 MARCH 2023

CERTIFIED SINCE

19 MARCH 2020

AUTHORISED BY

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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

Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper) at Tianjin Zhongwang Aluminium Co.,Ltd., China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Tianjin Zhongwang Aluminium Co.,Ltd
ENTITY NAME	Tianjin Zhongwang Aluminium Co.,Ltd
CERTIFICATION SCOPE	Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper) at Tianjin Zhongwang Aluminium Co.,Ltd., China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial 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 (6 – 9 January 2020)Surveillance Audit (6 – 8 December 2021)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">6 – 9 January 2020 (Initial Certification Audit)6 – 8 December 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 February 2020 (Initial Certification Audit)23 February 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (6 – 9 January 2020)</u></p> <p>1. Production of aluminium and aluminium alloy casting ingot, sheets, strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper).</p> <p>2. The whole area of Tianjin Zhongwang Aluminium Co.,Ltd. except medium/thick plate workshop 1 and phase III/IV (in constructing).</p> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (6 – 8 December 2021)

The audit scope included the following:

1. Production of aluminium and aluminium alloy casting ingot, sheets and strip products (including automotive aluminium alloy materials, aerospace aluminium alloy materials, tank body and lid gripper).
2. The whole area of Tianjin Zhongwang Aluminium Co.,Ltd. except medium/thick plate workshop 1 and phase III/IV (both under construction).

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope

AUDIT
OUTCOME

- Certification (Initial Certification Audit)
- Provisional Certification (Surveillance Audit)

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

22 March 2022 – 21 March 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

21 September 2022

CERTIFICATE
NUMBER

77

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Major Non-Conformance	The Entity has established procedures to compile the Applicable Law covering the areas of labour, ethics, health and safety and environment. The Legal, EHS and Human Resources Departments are responsible for the assessment of compliance, undertaken at least annually. However, the Entity has an outstanding court-ordered enforcement from 2021 for financial disputes with stakeholders (suppliers and subcontractors).
1.2 Anti-Corruption	Conformance	The Entity has business ethics policies and procedures including an Anti-Corruption and Bribery Policy and a Gift Policy, with employees provided with the relevant training. An ethics reporting channel is established and displayed in meeting rooms and the canteen. The Entity has conducted due diligence investigations for high-risk roles in the Supplier Management, Sales, Quality and Design Departments and all employees in these departments have signed an Honest Commitment Letter. Annual financial audits are conducted.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct consist with the ASI Performance Standard and regularly provides training to Workers. The Code of Conduct is communicated to suppliers by conducting the due diligence investigations and in signing the ASI Performance Standard Commitment Letter. The Code of Conduct is included in the Sustainable Development Report 2020.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a Management System on environmental, social and governance compliance. The Entity has obtained ISO14001:2015 and ISO 45001:2018 certification, valid till July 2022. The Entity's ASI Policy is posted on site.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Senior Management team is committed to the implementation of the ASI Management System. The effectiveness of the Management System is reviewed during annual Management Reviews.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal stakeholders through training, posts on-site and the internal website, and external stakeholders can access via the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&Catelid=29&ParentId=28
2.2 Leadership	Conformance	The Admin. Vice General Manager has been appointed as the Management Representative for ensuring social, environmental and governance requirements of the ASI Performance Standard are reflected in the Entity. The responsibilities are defined in the appointment letter.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has obtained ISO 14001:2015 and ISO 45001:2018 certification, valid until July 2022, with the audit scope covering the whole Entity.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established the ASI Management System to cover the Social Management System. Internal audits and management reviews are conducted annually to ensure the effectiveness of the Management System.
2.4 Responsible Sourcing	Conformance	The Entity is committed to responsible sourcing and implements this through signed ASI Commitment Letters, supplier assessments and engaging suppliers on the implementation of the ASI Performance Standard.
2.5 Impact Assessments	Conformance	The Entity regularly assesses impacts regarding environment, health and safety, social responsibility and Human Rights.
2.6 Emergency Response Plan	Conformance	The Entity has adequate and effective Emergency Response Plans (ERP) and includes crisis organisation, communication guidelines and business recovery plans. The ERP is developed together with internal and external experts. An Emergency Response Team (ERT) has been established and training is provided annually. The ERP's are registered with the local Environment Bureau and emergency drills are performed annually.
2.7 Mergers and Acquisitions	Conformance	All mergers and acquisitions, including the Due Diligence process is managed by the Entity's parent company. The parent company's procedures are relevant for the Entity. In the past three years, there have been no mergers or acquisitions in the Entity.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment is managed by the Entity's parent company. The parent company's procedures are relevant for the Entity. In the past three years, no closure, decommissioning or divestment occurred in the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and published a Sustainable Development Report 2020, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliance and liabilities in the Sustainable Development Report 2020, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Anti-Corruption requirements. The Entity implements Transparency and Anti-Corruption Policies and a qualified third-party prepared a financial audit report in 2020. All payments to government are based on the legal law or contracts, such as social insurance fee and business tax. There are no other payments.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from stakeholders and has an appropriate Complaints Resolution Mechanism. The Entity has obtained ISO 14001:2015 and ISO 45001:2018 certification.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has established the Environment Life Cycle Assessments procedure and conducted Life Cycle Assessments (LCA) for their major products according to the internal procedure and consistent with the cradle-to-gate approach. The LCA were conducted in May 2021. The Entity has established

CRITERION	RATING	COMMENT
		a procedure on how to disclose LCA information to clients upon request, and currently no client has requested LCA data.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has established the Environment Life Cycle Assessments procedure and conducted Life Cycle Assessments (LCA) for their major products according to the internal procedure and consistent with the cradle-to-gate approach. The LCA were conducted in May 2021. The Entity has established a procedure on how to disclose LCA information to clients upon request, and currently, no client has requested LCA data.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Sustainable Development Report 2020 indicates that the Entity will disclose Life Cycle Assessment information to clients upon request.
4.2 Product design	Conformance	The Entity has established procedures for Life Cycle Assessment (LCA) in the product design process to ensure the LCA considers various environmental impacts including energy consumption, water, air emission and waste. In the design phase all the environmental factors are identified and listed in the final design reports. The objective to reduce sustainability impacts is covered in the LCA reports.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and improvement programs for each process to reduce Aluminium Process Scrap during production. 100% of scrap is recycled by the internal smelter workshop. The scrap generation rate is reviewed during monthly management meetings to ensure targets are met.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has adequate and effective procedures including the Solid Waste Classify Procedure and Solid Waste Management Procedure to classify and dispose of Aluminium Process Scrap. Scrap is separated based on the alloy and recycled 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 established a strategy for the recycling of products at end-of-life. Clear targets for 2019 and 2020 and improvement programs are established. Annual targets are reviewed monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has a formal policy and procedures including Solid Waste Classify Procedure and Solid

CRITERION	RATING	COMMENT
		Waste Management Procedure for the internal aluminium recycling. All the recycled products are managed by the internal smelter workshop. The Entity has a clear target for the rate of recycled aluminium in final products. The recycled aluminium is comprised of internal scraps and re-smelter aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published GHG emissions data in the Sustainable Development Report 2020, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&Catelid=29&ParentId=28 The GHG calculation is performed by a qualified third party and includes Scope 1 and Scope 2 GHG emission generated in the Entity.
5.2 GHG emissions reductions	Conformance	The Entity has a CO ₂ emissions reduction target of 1% per year and 3% by the end of 2022 and have improvement programs addressing direct emission sources and indirect emission sources to achieve the target. The Entity's major GHG sources are electricity and natural gas, with electricity being provided 100% coal-fired generators. Energy data is tracked and reviewed monthly. The GHG emissions reduction plan is available for public upon request.
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 has established an air emission inventory for all emission sources for all the outlets. A qualified third party monitors the outlets quarterly. The Entity is a key pollution discharge unit in Tianjin. The Entity established continually reducing targets for major indexes from 2018 to 2022 and targets are tracked and reviewed by the management team annually. Emissions to Air data is available in the Sustainable Development Report 2020.

CRITERION	RATING	COMMENT
6.2 Discharges to Water	Conformance	<p>The Entity has established a wastewater inventory to control the Discharges to Water. Industrial wastewater is collected and treated by an internal WWTP (Wastewater Treatment Plant) prior to discharge to the local municipal WWTP. The Entity has established online monitoring system for the final outlets and a qualified third party monitors the control indexes as per the Pollutant Discharge Permit. The Entity has established a reduction plan for the wastewater discharges and progress of improvement programs are monitored. Wastewater management information is available in the Sustainable Development Report 2020: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28</p> <p>The current monitoring of Discharges to Water complies with the Entity's Pollutant Discharge Permit issued in July 2020.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity conduct assessment of Spills and Leakage annually, the most recent in August 2021. Six risk types have been identified as high and the Entity has taken preventive actions and implemented improvement programs for all the potential risks.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>The Entity has conducts assessment of Spills and Leakage annually, the most recent in August 2021. Six risk types have been identified as high and the Entity has taken preventive actions and implemented improvement programs for all the potential risks. Emergency Response Plans covering Spill and Leakage are established and registered with the local Environment Bureau. However, leakage prevention in the Hazardous Waste warehouse is inadequate.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has an Environment Protection Procedure which defines how to manage and report Spills. The Emergency Response Team has been established to respond to any Spill events. Spill drills are conducted annually to ensure the process is up to date.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The ASI Manual defines the reporting of Spills to local authorities, impacted units and affected people immediately and disclose the Spill in the Sustainable Development Report, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28</p>

CRITERION	RATING	COMMENT
		There has been no reportable Spill in recent years.
6.5a Waste management and reporting (strategy)	Minor Non-Conformance	<p>The Entity's Waste Management Procedure defines processes to collect and dispose of waste. Hazardous Waste is transferred to qualified external parties according to legal requirements. Inventory and disposal receipts are retained. The Entity has established continual improvement targets to reduce waste and the targets are reviewed annually by the Senior Management team.</p> <p>The Entity has established a labelling system for Hazardous Waste to include the required standard labels, however, some labels do not include the date of generation.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity discloses waste management information in the Sustainable Development Report 2020, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28</p>
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 (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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)	Conformance	The Entity's Scrap Management Procedure defines the process to recover and recycle Aluminium Dross. Prior to being sent to external vendors, the Entity recycles approximately 40% of dross internally.
6.8b Dross (recycling)	Conformance	Aluminium Dross is recycled and refined by internal smelters. Dross not recycled by the Entity is sold to an entity which uses the dross in the manufacture of fire resistant materials.
6.8c Dross (review of alternatives)	Conformance	There is no landfilling of Dross residues. The Entity reviews dross management monthly with the aim to reduce the Dross sent to external processors, which uses dross in the manufacture of fire resistant materials.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water consumption was considering in the Environmental Impact Assessment (EIA) conducted when the facility was founded and, in 2021, water balance testing and water mapping was conducted and a water inventory developed by a qualified third party. Two water supplier sources (tap water and recycled industry water provide by the municipal wastewater treatment plant) are identified and used by the Entity.
7.1b Water assessment (risk assessment)	Conformance	The Entity conducts a water risk assessment annually. The water risk assessment considers the industrial park where the Entity is located, nearby lands and waterways as the Area of Influence, and covers the water consumption data. Recycled water is used to reduce the risk of water consumption.
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce water consumption and has established management plans which outlines improvement actions, timeframes and individuals responsible for achieving the targets.
7.2b Water management (monitoring)	Conformance	The Entity has annual targets to continually reduce water consumption and has established management plans to achieve the reduction targets. The targets and progress of programs are reviewed quarterly.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The water-related risk assessment report is included in the Sustainable Development Report 2020, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment was included in the EIA (Environment Impact Assessment) reports, which were prepared by a qualified third party. The Entity is located in a government managed industrial zone which is not a protected area. The assessment found the Entity does not have a negative impact on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has established action plans for biodiversity management and the plans are approved by the local Environment Bureau.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established action plans for biodiversity management and the plans, which were consultative and designed in accordance with the Biodiversity Mitigation Hierarchy and are approved by the local Environment Bureau.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported its biodiversity management and outcomes in the Sustainable Development Report, available on the website: http://www.zhongwangtj.com/newsdetails.aspx?id=699&CatelId=29&ParentId=28
8.3 Alien Species	Conformance	The Entity assesses Alien Species annually and no material risk has been identified.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing 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 has established policies and procedures to commit to respect Human Rights. The Entity

CRITERION	RATING	COMMENT
		identifies the risk of adverse impacts on Human Rights and provides relevant training for all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established and a procedure on the Human Rights Due Diligence process, which is conducted annually and considers major suppliers and the Entity internally.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a Code of Conduct to comply with Human Rights. The Entity has not caused or contributed to adverse Human Rights impacts. External and internal communication channels are established for Workers and stakeholders. The Entity takes corrective action on complaints and communication issues accordingly.
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure compliance, including women not working in hazardous roles which are prohibited by law and initiatives to support work-life balance.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as no cultural and sacred heritage is affected by the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as Resettlement was not required as no local residents are affected by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as Resettlement was not required as no local residents are affected by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established the ASI Management 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 Entity is in close contact with surrounding Communities and the majority of employees live in the local area. The Entity has installed environmental protection devices, such as air

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		emission treatment facility, to reduce the impact to surrounding Communities by air emissions and noise.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with local Communities and the majority of employees live in the local area. The Entity has established plans to support the surrounding Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Internal investigations from Due Diligence investigation reports as well as the supplier signed commitments, has identified that no material comes from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	Security services are provided by the Entity's employees who are trained on the ASI Performance Standard requirements. Security staff undergo monthly training which covers the respect of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the Workers' rights in the Code of Conduct and expects the same of its suppliers. A Labour Union exists at the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of Workers to Collective Bargaining and to participate in any collective bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for Workers and a Labour Union exist at the Entity.
10.2a Child Labour (minimum age)	Conformance	Child Labour (under 16 years) or Young Workers (16 to 18 years) are not used by the Entity.
10.2b Child Labour (hazardous)	Conformance	Child Labour or Young Workers are not used by the Entity. However, Young Workers are given special protection including not working in hazardous environments.
10.2c Child Labour (worst forms)	Conformance	Child Labour or Young Workers are not used by the Entity. However, Young Workers are given special protection. The Entity commits itself and expects its

CRITERION	RATING	COMMENT
		suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI Management Manual and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Forced Labour is not used in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not use or support the use of Forced Labour. All employees are employed directly and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Not Applicable	The Entity does not use or support the use Migrant Workers. Workers are all local citizens.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not use or support the use of Forced Labour. Deposits or security payments are not permitted.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not use or support the use of 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 does not use or support the use of Forced Labour. The Entity does not hold any original document, passport or permit in personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not use or support the use of Forced Labour. The period of time for the announcement of termination of employment is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has established a policy and procedure on Non-Discrimination which covers hiring, salary, promoting, training and termination processes.
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System. Direct and frequent communication with Workers and the representatives of the Worker's councils is established. A positive working environment and direct communication were mentioned by interviewed persons.
10.6 Disciplinary practices	Conformance	The Entity does not tolerate any form of punishment or harassment. The Entity requires its suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker

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		representation. Records of disciplinary action is required to be confirmed by Workers and Management.
10.7a Remuneration (living wage)	Minor Non-Conformance	Wages are in compliance with legal standards and meet the basic needs of Workers. All the employees are enrolled in the social insurance scheme. However, a small percentage of employees were found to not be enrolled in the social insurance scheme.
10.7b Remuneration (method of payment)	Major Non-Conformance	Since January 2020, wage payments have been delayed in a systematic way. The Labour Contract requires the payment of wages on or before the 25th of the following month. Every month since January 2020 payment has been delayed by between 5 and 64 days. The Entity did not take effective action to correct the non-conformance identified during the Certification Audit in the required timeframe and therefore has been elevated to a Major Non-Conformance.
10.8 Working Time	Major Non-Conformance	Working hours are recorded electronically and are monitored. Total weekly working hours do not exceeded the legal requirement or industry standards. However, some Workers do not have a day off in every 6 days, and the Entity has not established the annual leave policy. The Entity did not take effective action to correct the non-conformance identified during the Certification Audit in the required timeframe and therefore has been elevated to a Major Non-Conformance.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has established a formal Policy for Occupational Health and Safety which is displayed in the public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has adequate and effective policies and procedures to ensure the Occupational Health and Safety Policy applies to all Workers and Visitors, including the requirement for orientation training and regular monitoring.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has established a formal Policy for Occupational Health and Safety which includes commitment to legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has established a formal Policy for Occupational Health and Safety which includes the right of Workers to stop unsafe work and that the Entity will provide a safe working environment.
11.2 OH&S Management System	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The latest audit conducted in April 2021, issued a total of three minor findings and two observation findings related to risk control. The Entity has implemented effective corrective actions, approved by the certification body, to correct the findings.
11.3 Employee engagement on health and safety	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has adequate and effective mechanisms to collect Workers' feedback on Occupational Health and Safety. The mechanisms include suggestion boxes, Worker representative meetings, irregular worker interviews and accident/injury analysis. Related records have been managed soundly since the founding of the Entity.
11.4 OH&S performance	Conformance	The Entity is certified to ISO 45001:2018, valid until July 2022. The Entity has established targets and control programs for Occupational Health and Safety performance. Management reviews the programs and targets monthly.

Document Control and Version History

Revision	Date	Notes
0	19 March 2020	Initial Certification Audit – Full Certification
1	22 March 2022	Surveillance Audit – Provisional Certification; Updated Audit Scope description for the Initial Certification Audit to include relevant Supply Chain Activities.