

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# NOVELIS (CHINA) ALUMINUM PRODUCTS CO., LTD

CERTIFICATE  
NUMBER

199

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

22 APRIL 2022

DATE OF EXPIRY

21 APRIL 2025

CERTIFIED SINCE

22 APRIL 2022

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

The manufacture of aluminum automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in (China).

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# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

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### OVERVIEW

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MEMBER NAME           Novelis Inc

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ENTITY NAME           Novelis (China) Aluminum Products Co., Ltd

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CERTIFICATION SCOPE           The manufacture of aluminum automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.

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SUPPLY CHAIN ACTIVITIES           

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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ASI STANDARD           

- Performance Standard V2

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AUDIT TYPE           

- Initial Certification Audit

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AUDIT FIRM           DNV Business Assurance Services UK Ltd.

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AUDIT DATE           24 – 25 February 2022

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AUDIT REPORT SUBMISSION           30 March 2022

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AUDIT SCOPE           The audit scope includes manufacture of aluminum automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.

The supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME           Certification

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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.

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CERTIFICATION  
PERIOD

22 April 2022 – 21 April 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

21 October 2023

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CERTIFICATE  
NUMBER

199

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## 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 ASI Performance Standard's legal compliance requirements. The Entity has systems in place to maintain awareness of and to ensure compliance with Applicable Law. There have been no fines or requests for corrective action issued by government agencies and other stakeholders.
1.2 Anti-Corruption	Minor Non-Conformance	<p>Policies and processes to identify and prevent Corruption such as the Management Procedure of Anti-Corruption are implemented and personnel are trained. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has a Code of Conduct for Labour and Business Ethics:</p> <p><a href="https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf">https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</a></p> <p>However, the risk assessment for some parts of the business exposed to bribery risk is incomplete and anti-corruption measures are not reviewed regularly.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity has implemented measures, including training and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is available on the website:</p> <p><a href="https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf">https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Management Policies are consistent with the environmental, social, and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented Policies.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's Policies are available for internal and external stakeholders via training, on-site display and on the website via the following links: <a href="https://www.novelis.com/about-us/purpose">https://www.novelis.com/about-us/purpose</a> <a href="https://www.novelis.com/wp-content/uploads/2021/11/2021-Novelis-Purpose-Report.pdf">https://www.novelis.com/wp-content/uploads/2021/11/2021-Novelis-Purpose-Report.pdf</a>
2.2 Leadership	Conformance	Senior Management Representatives have been nominated.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System and holds a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented. Social and occupational health and safety impacts are identified and assessed and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Quality, Environment and Health (QEH) 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: <a href="https://www.novelis.com/suppliers/supplier-ethics">https://www.novelis.com/suppliers/supplier-ethics</a> However, some social responsibility issues are not covered in the audits for major next-tier suppliers.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. No such case has occurred since 2020.
2.6 Emergency Response Plan	Conformance	The Entity has established a Business Continuity and Resumption Plan which addresses fire, earthquake, hazardous chemical leak, extreme weather, labour shortage, key equipment breakdown and the relevant resumption plan. The Emergency Response Plans are developed in collaboration with potentially affected stakeholder

CRITERION	RATING	COMMENT
		<p>groups such as Communities, Workers and their representatives and, based on the requirements of ISO 14001 and ISO 45001 and legal requirements, are registered with in the relevant government agencies.</p> <p>Employees are provided the relevant training courses and emergency response exercises are conducted for fire/evacuation and chemical leak.</p>
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has occurred since the Entity commenced operations in 2012.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment is established in accordance to the requirement of ASI Performance Standard, but no such activity has occurred since the Entity commenced operations in 2012.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity is included as part of the Novelis Group sustainability reporting. The annual Sustainability Report is published on the Entity's website: <a href="https://zh-hans.novelis.com/wp-content/uploads/2021/04/Novelis-Sustainability-Platform-Brochure-Chinese.pdf">https://zh-hans.novelis.com/wp-content/uploads/2021/04/Novelis-Sustainability-Platform-Brochure-Chinese.pdf</a></p>
3.2 Non-compliance and liabilities	Minor Non-Conformance	There have been no significant fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law since the Entity commenced operations in 2012. Information on compliance with Applicable Law however, is not publicly disclosed.
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity only make or have made on its behalf, payments to governments on a legal and/or contractual basis. The Entity's financial audit reports are verified by a Third Party accounting firm and financial results are disclosed on the website: <a href="http://investors.novelis.com/historical-results">http://investors.novelis.com/historical-results</a></p>
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	Minor Non-Conformance	<p>Internal complaints or grievance reporting mechanisms (hotline number, suggestion boxes, grievance handling council) are established and external complaints or whistleblowing mechanisms (hotline number) are accessible via the website:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf">https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</a> However, the hotline only provides the service in English (and not in the local language) which negatively impacts the effectiveness of the program.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	An environmental Life Cycle Assessment (LCA) report based on ISO 14040 and ISO 14044 has been prepared by a third party and addresses all products and production lines.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) report provides the cradle-to-gate information on its aluminium products. The assessment report covers all product processes and production lines. The LCA report is available at: <a href="https://www.novelis.com/wp-content/uploads/2022/02/12_诺贝丽斯（中国）汽车专用铝板生命周期评价报告.pdf">https://www.novelis.com/wp-content/uploads/2022/02/12_诺贝丽斯（中国）汽车专用铝板生命周期评价报告.pdf</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment (LCA) report is published on the Entity's website which can be reached by external stakeholders and the Entity provides the LCA report to external parties upon request: <a href="https://www.novelis.com/wp-content/uploads/2022/02/12_诺贝丽斯（中国）汽车专用铝板生命周期评价报告.pdf">https://www.novelis.com/wp-content/uploads/2022/02/12_诺贝丽斯（中国）汽车专用铝板生命周期评价报告.pdf</a>
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.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection and recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates the Aluminium alloys by grades for recycling. The target for process scrap utilization is 100%.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is implementing a Recycling Alloy Development campaign which aims to collect post-customer scrap from automotive manufacturers. The campaign is currently at the feasibility analysis stage.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	In the absence of complete local, regional or national collection and recycling systems for Aluminium scraps in China, the Entity is working with automotive manufacturers on opportunities to collect and recycle scrap at the end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Major Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions and energy use by source are tracked, calculated and documented annually. The GHG emission report 2021 is checked and internally approved prior to publishing on the website: <a href="https://www.novelis.com/wp-content/uploads/2022/02/06.-诺贝丽斯(中国)铝制品有限公司2021年温室气体盘查报告.pdf">https://www.novelis.com/wp-content/uploads/2022/02/06.-诺贝丽斯(中国)铝制品有限公司2021年温室气体盘查报告.pdf</a>
5.2 GHG emissions reductions	Conformance	The Novelis Group established a global Carbon Footprint Strategy to 2050. Following the strategy, the Entity established local GHG emission reduction targets and associated management programs. The information is available at: <a href="https://www.novelis.com/wp-content/uploads/2022/02/05_诺贝丽斯(中国)铝制品有限公司温室气体减排方案.pdf">https://www.novelis.com/wp-content/uploads/2022/02/05_诺贝丽斯(中国)铝制品有限公司温室气体减排方案.pdf</a>
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 waste air generated by the Entity is collected and treated before discharge and emissions meet the local discharge limit. In compliance with the operational control requirements for ISO 14001, the air emission management plan with actions/controls is implemented to mitigate adverse impacts.
6.2 Discharges to Water	Conformance	Discharges to Water is addressed and managed within the Environmental Management System which is compliance with ISO 14001. The wastewater generated by the Entity is collected, treated and recycled and there is no discharge into the external drainage system. Wastewater is



CRITERION	RATING	COMMENT
		monitored and the major pollutants meet the local legal discharge limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	In compliance with ISO 14001 requirements, an assessment of the areas of operations where Spills and Leakage may contaminate air, water and soil is undertaken by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	In compliance with both ISO 14001, relevant legal requirements and the results of the Spills and Leakage risk assessment, the Entity has established control measures in the daily operation procedures and the Emergency Response Plan for environmental accidents associated with Spills and Leakage. The relevant persons are provided with training.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of Spills internally and externally is defined in the Emergency Response Plan and known by the relevant persons. There have been no Spills in the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has defined the requirement to disclose the amount, nature and potential impact of significant Spills to all relevant interested parties. In the annual public report, the impact assessment and the remedy measures shall be disclosed. There have been no Spills in the past three years.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is addressed by the Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is in compliance with legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses waste generation and disposal information, available for download on the website, refer the ASI Documentation (China) section: <a href="https://zh-hans.novelis.com/sustainability">https://zh-hans.novelis.com/sustainability</a>
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.

CRITERION	RATING	COMMENT
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.
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.
<b>PRINCIPLE 7 WATER STEWARDSHIP</b>		
7.1a Water assessment (mapping)	<b>Conformance</b>	Water is sourced from the municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into Municipal Drainage System is granted by the government agency for sanitary wastewater. The wastewater with nitrogen is treated and reused and is not discharged to the external water system.
7.1b Water assessment (risk assessment)	<b>Conformance</b>	The Entity has conducted a water risk assessment via the approved Environmental Impact Assessment (EIA) and the pollutant discharge permit in which the water discharge is identified and assessed. The Entity's operational, internal and external risks in its Area of Influence were considered and due to the nature of the product and production processes and the external environment, the level of water-related risk is low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as 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 Entity publicly discloses the information on water-related risks in the Water-Related Risks Assessment Report and Water Balance Diagram which are both available for download on the website, refer the ASI Documentation (China) section: <a href="https://zh-hans.novelis.com/sustainability">https://zh-hans.novelis.com/sustainability</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is addressed in the Environmental Management System. The Entity has conducted an assessment on risks/impacts by its own operations and in its Area of Influence and the risk is assessed as low. The Biodiversity Risk Assessment Report is available for download on the website, refer the ASI Documentation (China) section: <a href="https://zh-hans.novelis.com/sustainability">https://zh-hans.novelis.com/sustainability</a>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.3 Alien Species	Conformance	The main carrier medium (wooden pallets) 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 mines)	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 Entity has implemented a Policy commitment to respect Human Rights and has communicated this to all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and a Due Diligence process is established and includes the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to stakeholders. There has been no major Human Rights impacts reported.
9.2 Women's Rights	Conformance	The Entity has implemented measures to ensure women's legal rights and interests are respected. There have been no complaints received from women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	The Entity has a procedure in place to identify cultural and religious sites and has conducted a risk assessment to reduce impact on cultural and religious sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there has been no Resettlements required in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there has been no Resettlements required in the history of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impact on Local Communities are established and implemented. There have been no complaints received from the Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity identifies and assess the impact on Local Communities. The control measures for the identified impact on Local Communities are established and implemented. There have been no complaints received from the Local Communities.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity employs Workers from the Local Communities, contributing to livelihoods through employment opportunities in the industrial area.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a commitment to not using conflict minerals or contribute to Human Rights abuses in Conflict-Affected and High-Risk Area and communicates this through the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a commitment letter to not use conflict minerals. There have been no complaints received.
9.9 Security practice	Conformance	Security services are outsourced and the security contractor complies with the Entity's Supplier Code of Conduct. Body searches, including the restriction of free movement, are not permitted. There have been no grievances or complaints received.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits itself to respect the Workers' rights. There are six elected Worker representatives including two women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are no Collective Bargaining Agreements in the Entity, however management demonstrate the rights of Workers to Collective Bargaining is respected.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives are available to engage with management on behalf of the Workers on any issues of concern.
10.2a Child Labour (minimum age)	Conformance	Child Labour (under 16 years) is prohibited in China. There is no history or current use of Child Labour or young Workers (16 to 18 years) at the Entity.
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.
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.
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
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are hired directly. Workers are not required any form of deposit; recruitment fee or equipment advance.
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 loans or hold Workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour and there is no restriction of Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour and does not retain Workers original documents, only copies of original documents are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The signed labour contracts do not contain language to limit the Workers' ability to voluntarily terminate their employment. Workers are aware of their right to terminate employment without penalty and the required notice period for terminating employment is in compliance with Labour Contract Law. Resigned Workers receive final entitlements without delay.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. No case of Discrimination has been received. Recruitment advertisements and the training plan both indicate employment decisions are solely based on the candidate's ability to perform the job requirements. Interviewed workers confirm they feel equal in the company.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers' representatives is established. The communication channels are announced to Workers and Workers can raise complaints or concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are not related to inhumane actions, harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation and, and require the confirmation of involved Worker. The Entity's disciplinary procedure has been implemented.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined and the basic wage is above the local legal minimum wage. The compensation for the Overtime meets the legal requirements. Mandatory allowances are provided to Workers and all employees are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all Workers via bank transfer at the end of each month.
10.8 Working Time	Conformance	Working hours are recorded. The regular Working Time is 40 hours over a five days. For Workers in the workshop there are four groups with three shifts and office staff cover one shift. Working hours are monitored and the monthly Overtime working hours do not exceed the legal monthly limit, and at least one day off per week is guaranteed.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	In compliance with ISO 45001:2018, the Occupational Health and Safety Policy is established, implemented, periodically reviewed and communicated with stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational 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 Occupational Health and Safety Policy includes a 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 quarterly. The most recent legal compliance evaluation was conducted in December 2021 and there was no violation identified.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training to understand the hazards, occupational health and safety risks and control measures that are aimed to protect them and the right to refuse unsafe work without negative consequences.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System certified according to ISO 45001:2018. However, the audit found that the required OH&S risk assessment was not conducted prior to the temporary repairing/maintenance task.
11.3 Employee engagement on health and safety	Conformance	The Entity has several mechanisms by which the Workers can raise, discuss and participate in the resolution of Occupational Health and Safety (OH&S) issues with management. Workers are encouraged to report their concerns or advice on OH&S issues or via the Worker representative to management.
11.4 OH&S performance	Conformance	Occupational Health and Safety targets and improvements are established and documented in Occupational Health and Safety Program. The implementation plans are established and implemented.

#### **Document Control and Version History**

Revision	Date	Notes
0	22 April 2022	Initial Certification Audit - Full Certification.