

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Guangdong Betterlid Packaging Material Co.,Ltd.

CERTIFICATE NUMBER
372

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
SGS-CSTC
STANDARDS
TECHNICAL
SERVICES

DATE OF ISSUE
13 JUNE 2024

DATE OF EXPIRY
12 JUNE 2027

CERTIFIED SINCE
13 JUNE 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'Jha', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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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

Guangdong Betterlid Packaging
Material Co.,Ltd. located in
Guangdong Province, China,
manufactures Aluminium alloy
sheets and foils for food packaging.
Its main process is Aluminium coil
processing, including cleaning,
coating, curing, cutting, printing,
and packing.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Guangdong Betterlid Packaging Material Co.,Ltd.
ENTITY NAME	Guangdong Betterlid Packaging Material Co.,Ltd.
CERTIFICATION SCOPE	Guangdong Betterlid Packaging Material Co.,Ltd located in Guangdong Province, China, manufactures Aluminium alloy sheets and foils for food packaging. Its main process is Aluminium coil processing, including cleaning, coating, curing, cutting, printing, and packing.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material ConversionOther manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">27 - 30 March 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 April 2024
AUDIT SCOPE	<p>The Audit Scope included the manufacturing of Aluminium alloy sheets and Aluminium foils for food packaging at Guangdong Betterlid Packaging Material Co.,Ltd. Its main process is Aluminium coil processing, including Aluminium coil cleaning, coating, curing, cutting, printing and packing in Guangdong Province, P.R. China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material ConversionOther manufacturing or sale of products containing Aluminium. <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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 13 June 2024 – 12 June 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 12 June 2025

CERTIFICATE NUMBER 372



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://Aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Guangdong Betterlid Packaging Material Co.,Ltd. (the 'Entity') was established in August 2017 with a registered address of No. 12, Fengshan 4th Road, Changlong Industrial Zone, Sijiu Town, Taishan City, Guangdong Province, China. It covers an area of 81,113 square meters.

The Entity produces two categories of Aluminium alloy sheets and foils for food packaging, and mainly sold to manufacturers in Europe, America, and the Asia-Pacific region. The Entity is located in an industrial zone which was established by the government, and there are no nearby sensitive areas such as Indigenous Peoples, schools, scenic spots, or drinking water source areas.

The main production processes of the Entity include Aluminium coil cleaning, coating, curing, cutting, printing, and packaging. The main buildings of the factory include one office building, four factory buildings, and one dormitory building (the first floor is a canteen), with a sewage treatment station, air pressure station, hazardous waste warehouse, general solid waste warehouse and other supporting facilities. There are sports fields and other recreational facilities in the factory area for the leisure use of employees. The Entity currently has 210 employees, with key stakeholders including shareholders, customers, partners, downstream supply chains, and relevant government departments (e.g., tax authorities). The productive activities of the enterprise do not affect neighbouring communities and residents.

The Entity has been focusing on the production, processing, research and development of Aluminium packaging materials which are widely used for 'easy-open' ends, Aluminium tabs, screw caps, Maxi-P caps, Aluminium bowls, containers, 'easy peel-off' ends and Aluminium foil products.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Low	Medium	Low	LOW
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL				MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established the Collection and Control Procedure for Laws, Regulations, and Other Requirements, which stipulates responsibilities and the method, timing, and frequency of identifying and evaluating compliance with laws and regulations applicable to the environment, society, and governance, in the form of a written Compliance Evaluation Report.
1.2 Anti-Corruption	Conformance	The Entity has evaluated the risks relating to commercial Bribery and has established Anti-Corruption and Anti-Bribery Procedures, which stipulate the prohibition of Corruption and Bribery in all business practices and transactions. The Anti-Corruption and Anti-Bribery policies and procedures have been communicated to and understood by employees and others acting on behalf of the Entity. http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f94e006df70.pdf . Further information is available at: https://aiqicha.baidu.com/company_detail_31648737902142?t=0 .
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, including its ASI Governance Manual and employee handbook. The Entity conducts an internal Audit and annual management review to guarantee compliance with the ASI Performance Standard. The Entity's ASI Governance Manual stipulates that "if important changes to environmental, social and governance risks or the appearance of control defects, the Policy should be reviewed or revised". Since the establishment of the Entity's Code of Conduct, no important changes or major control defects have occurred." The Entity's Code of Conduct is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/27/6603e2a1dae7e.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established a Management System and implemented integrated Policies consistent with the environmental, social, and governance practices included in the ASI Performance Standard. The policies and procedures are reviewed within less than five years and approved by the Entity's General Manager, who supports these policies by providing resources to implement them. The Entity's ASI Governance Policy is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f95420ca019.pdf .
2.2a-c Leadership	Conformance	The Entity has a Senior Management representative to lead the implementation and communication of the Environmental, Social, and Governance Policies, including providing the resources needed to establish, implement, maintain, and improve the Management Systems required throughout the ASI Performance Standard. Each department's responsibility, authority and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management	Conformance	The Entity has documented and implemented an Environmental Management System. The Entity conforms with legal compliance requirements and is independently certified to ISO14001:2015.

CRITERION	RATING	COMMENT
Systems - Environmental		<p>http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/30/6607b772d8f71.pdf.</p> <p>The previous external Audit was conducted by SGS from in November 2023. There were no Major Non-Conformances identified, and two minor non-compliances have been effectively closed. Until now, there has been no fine, nor any request for corrective actions from government agencies and other stakeholders.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has established and implemented a Social Management System. The Social Responsibility Management System Manual, Control Procedures, and Standard Operating Procedures (SOP) address the protection of minor Workers and the prohibition of Child Labor, female employee protection, working hours, Human Rights, grievance process information, privacy and security protection. The Entity has established an Environmental, Social Responsibility and Human Rights Impact Assessment Report for 2023. Refer to: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66028e7449bdb.pdf.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a ASI Governance Manual and Responsible Sourcing Policy, which define related requirements. The Responsible Sourcing Policy is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f95420ca019.pdf.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Environmental, social, cultural, and Human Rights Impact Assessments are well implemented in various departments. The identified risks relating to social, environmental, Occupational Health and Safety (OH&S) and governance were assessed, and the associated control measures have been established and implemented. There have not been any new projects or major changes since the Entity became an ASI member.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has conducted an Environmental, Social Responsibility and Human Rights Impact Assessment Report, which is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66028e7449bdb.pdf</p> <p>The identified risks and the associated control measures have been established and implemented. There have not been any new projects or major changes since the Entity became an ASI member.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established and implemented Emergency Response Plans, with personnel trained in collaboration with potentially affected stakeholder groups. The Entity has also conducted a comprehensive environmental and safety plan exercise. The latest version of the Emergency Response Plans are available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/21/65fbd927130b0.pdf.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which takes into account Material adverse, environmental, social and governance impacts. The Entity reviews the Business Resilience Plan every five years, including analysis of indication of a control gap, or after any changes to the business that alter the nature or scale of environmental, social and</p>

CRITERION	RATING	COMMENT
		governance risks.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Management Procedure for Mergers and Acquisitions. However, no such activity has occurred to date.
2.10a-b Closure, Decommissioning and Divestment	Conformance	A procedure for Closure, Decommissioning and Divestment is established in accordance with the ASI Performance Standard requirement. However, no such case has occurred to date.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed a Sustainability Development Report that addresses governance (related parties communication, compliance management) and Performance (environment and energy, Labour and Human Rights, work conditions, OH&S, responsible sourcing, community and public charity). The Report is available at: http://www.betterlid.cn/page-41812.html .
3.2 Non-compliance and Liabilities	Conformance	In accordance with the official websites of the relevant government agencies and Non-Governmental Organisations (NGOs), the government agencies have raised no such case. No significant fines, judgments, penalties, or non-monetary sanctions for failing to comply with Applicable Law have been found. This information is publicly disclosed at: http://www.betterlid.cn/page-41812.html
3.3a-c Payments to Governments	Conformance	The Entity has established a management process for Payments to Governments, including taxes, water and electricity fees, and employee insurance premiums. The Entity only makes legal and/or contractual payments to governments. More information can be found in the Sustainability Report at http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66027f9e45858.pdf .
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented Stakeholder Complaints and Grievance Management Procedures. The whistle-blowing, Complaint and Grievance Mechanism is accessible at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f94e006df70.pdf .
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity's Life Cycle Assessment (LCA) Report only evaluates its own environmental impact, excluding the environmental impact of upstream raw materials, which is inadequate for this criterion. The Entity's Internal LCA Report is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66027fc3c5aec.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity's Life Cycle Assessment (LCA) Report only evaluates its own environmental impact, excluding the environmental impact of upstream raw materials, which is inadequate for this criterion. The Entity's Internal LCA Report is available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66027fc3c5aec.pdf

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity has established a Control Procedure for new product development, which stipulates that the selection and utilisation of materials are considered from the production development and process planning process. This includes appropriate process selection, improved process efficiency, equipment and load matching, process optimisation, service life, convenient maintenance and saving and easy Scrap and disposal.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has set a recycling rate of 100% as a goal for process waste generated during the production of Aluminium products and regularly evaluates the achievement of this goal.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has an unclear understanding of this criterion. The Entity's recycling strategy is designed around the process waste only missing out the recycling of Aluminium at the End of Life. The Entity has disclosed its Internal Waste Aluminium Recycling Strategy on its official website at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/07/65e97b59984d7.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Waste and non-conforming (out of specification) products from the client (including those returned from its process) are among the recycling sources in the Entity's Waste Aluminium Recycling Strategy. As there are no local Aluminium collection and recycling systems in Guangdong, the Entity ensures that the production process and the waste from their customers can be fully (i.e. 100%) recycled, and the specific recycling method shall be implemented in accordance with the contract agreement determined by both parties.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has established GHG Management Procedures and has received a Greenhouse Gas Verification Statement of conformity with ISO14064-1:2018 issued by an independent body, which is publicly disclosed at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/20/65fa596a64cce.pdf The Entity's Greenhouse Gas Emissions report is publicly disclosed at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66027fa8dece1.pdf The Entity has publicly disclosed its carbon peak and carbon neutral implementation plan on its website: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/07/65e97b879eb6d.pdf However, the Entity's Greenhouse Gas Emissions report currently does not incorporate GHG Emissions Scope 3.
5.2a Aluminium Smelter GHG Emissions Intensity - Started Production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In Production up to and	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
including 2020		
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Controlling and Management Procedure, which requires an annual management review of the Entity's GHG inventory. The Entity reviews the GHG Emission Reduction Plan and Pathway in case of business changes. The targets in this Plan address both direct and indirect Scope 1 and Scope 2GHG Emissions. However, the Entity's Greenhouse Gas Emissions report does not consider GHG Emissions Scope 3. The GHG Emission Reduction Plan is available at:</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/07/65e97b879eb6d.pdf.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established a GHG Inventory Procedure specifying GHG source and sink identification, qualification of GHG emissions and removals, and a GHG reduction target. The measurement and monitoring instruments for the GHG inventory have been calibrated. The Entity has also developed and implemented a GHG reduction plan and has publicly disclosed its performance against this Plan.</p>
OA 4B6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has established regulations on its Emissions to Air, which require a review of the Air Pollutant Reduction Plan annually and following any process changes that could lead to greater pollution risk. The Entity has reviewed its environmental targets, including the Emissions to Air reduction target. The management of air emissions is demonstrated as being effective.</p> <p>The Entity has publicly disclosed its exhaust gas emission and reduction plan at:</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/26/66027fc3c5aec.pdf and</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/20/65fa5045ddd48.pdf.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has publicly disclosed its wastewater discharge in 2023 and its reduction plan in 2024 on its website at:</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/26/66027fc3c5aec.pdf and</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/20/65fa5045ddd48.pdf.</p> <p>The Entity reviews the reduction plan for Discharges to Water every five years. In case of any discharge event that internally or externally exceeds the mandated limits, the Plan is reviewed immediately. The same applies if any indication of a potential control gap exists.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed major risk areas where Spills or Leakages could contaminate air, water or soil. The Entity has developed an Emergency Response Plan, including actions to respond to Spills or Leakages, which is reviewed every five years or after any Spill / Leakage event or any changes to the Business. The same applies if any indication of a potential control gap exists. The latest Emergency Response Plan is available at:</p> <p>http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/21/65fbd927130b0.pdf.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has publicly disclosed leakage risk identification and assessment results on its website at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/19/65f8d90e06440.pdf. http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/07/65e97c1425362.pdf.</p> <p>There has been no Spill or Leakage event t.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>Waste Management Regulations are in place in the Entity's jurisdiction and require waste separation, collection, and storage. The waste reduction target is reviewed annually, and the Entity publicly discloses its solid waste in 2023 and reduction plan in 2024 on its website at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/19/65f8d91d57a95.pdf and, http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/20/65fa5045ddd48.pdf</p> <p>The Environmental Impact Assessment was completed before the Entity's construction. This assessment concluded that there would be no material impacts on human well-being and the environment as the Entity is situated in an industrial zone. However, the Entity's catering contractors who manage food waste are not appropriately qualified and do not meet the Jiangmen food waste management measures.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has conducted a Water Assessment considering the water-related risks, which were determined as low. Water consumption usage and risk evaluations are publicly disclosed. For information about the water balance draw, please refer to: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/22/65fcf6a6c08c1.pdf.</p> <p>The Entity has established a Water Management Procedure, including a Water Resource Management Plan, which is available at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/11/65ee51a8e15ac.pdf.</p> <p>The Entity's Water Resources Risk Assessment Report is available at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/22/65fcf68b24be0.pdf.</p>
7.2a-e Water Management	Conformance	<p>The Entity's Water Resource Management Plan states the Entity's unit product water consumption target, water measurement instruments management, water accounting data management and the provision of water-saving awareness training for staff. A local water utility supplies water to the Entity and there are no water-related risks in Xijiang Watersheds. The latest version of the Water Resource Management Plan is available at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/11/65ee5</p>

CRITERION	RATING	COMMENT
		1a8e15ac.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located in an industrial area which was established by the local government. Based on the Entity's Biodiversity Risk Assessment Report, no protected flora or fauna are found in this area. Physical biodiversity and Ecosystem Services' risks and potential impacts are determined as low. The Entity's Biodiversity Risk Assessment Report is available at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/07/65e97c735a7a1.pdf .
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable as the Entity is located in an industrial area established by the local government. Based on the Entity's Biodiversity Risk Assessment Report, no protected flora or fauna were found in this area. Physical biodiversity and ecosystem services' risks and potential impacts were deemed low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as the Entity is located in an industrial area established by the local government. Based on the Entity's Biodiversity Risk Assessment Report, no protected flora or fauna were found in this area. Physical biodiversity and Ecosystem Services' risks and potential impacts have been determined as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as the Entity is located in an industrial area established by the local government. Based on the Entity's Biodiversity Risk Assessment Report, no protected flora or fauna were found in this area. Physical biodiversity and Ecosystem Services' risks and potential impacts have been determined to be low.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could significantly harm biodiversity. It avoids this by avoiding the receipt of products internationally. Also, as per customs requirements, all wooden cases are fumigated before the wooden case packing materials come into China. The Entity's Garden suppliers are locally sourced. The Entity communicates its Alien Species management requirements to all relevant parties, including suppliers, employees, visitors and contractors.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Not Applicable	The Entity commits to "No Go" in World Heritage properties. However, the Entity is located in an industrial area established by the local government, and there are no World Heritage sites located near or adjacent to the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as the Entity is located in an industrial area established by the local government, and there are no Protected Areas near or adjacent to the Entity.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed an ASI Governance Policy, which describes the guidelines for respecting Human Rights and promoting gender equality (item 4). The Policy is available at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/19/65f95420ca019.pdf.</p> <p>The Entity has conducted a Human Rights Impact Assessment, and its Human Rights Due Diligence process addresses its Supply Chain. To date, there have been no Human Rights violations in the Entity. More information can be found in the Environmental, Social Responsibility, and Human Rights Impact Assessment Report at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/26/66028e7449bdb.pdf.</p> <p>The Entity has established and published a Complaints/Grievance channel for stakeholders. Stakeholder Complaints and Grievance Management Procedures are available on the Entity's website at http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/19/65f94e006df70.pdf.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has identified legal rights for women and implemented control measures to ensure these are met. The Entity has established regulations on Labour Protection to protect the rights and Interests of female employees, which stipulate that men and women shall receive equal pay for equal work and that men and women shall be treated as equals in terms of promotion, advancement, appraisal of professional and technical positions, appraisal of skills, education and training of employees, and welfare benefits for employees; that female employees shall be guaranteed special labour protections; and that female employees shall enjoy equal rights to those of male employees about the enjoyment of welfare benefits.</p> <p>Women presently make up 21% of the Entity's management. The labour union has a female Workers' Committee to protect the rights and protect the welfare of female Workers. A whistleblower hotline has been set up to receive complaints and requests for assistance from female employees who have been treated unfairly. More information regarding the protection of the rights and interests of women is available in the Environmental, Social Responsibility and Human Rights Impact Assessment Report at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/26/66028e7449bdb.pdf and also at the 2023 Annual Sustainability Report at: http://www.betterlid.cn/home/6/7/kzom9/resource/2024/03/26/66027f9e45858.pdf.</p>
9.3a-i Indigenous Peoples	Not Applicable	Whilst the Entity respects the rights and interests of Indigenous Peoples, however, this Criterion is not applicable as the Entity is located in an industrial area planned by the local government, and no Indigenous People were identified in this area.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	Whilst the Entity respects the rights and interests of Indigenous Peoples, however this Criterion is not applicable as the Entity is located in an industrial area planned by the local government, and no Indigenous People were identified in this area.
9.4b Free, Prior, and Informed Consent (FPIC) -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Bauxite Mining		
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Conformance	Whilst the Entity respects the rights and interests of Indigenous Peoples, however this Criterion is not applicable as the Entity is located in an industrial area planned by the local government, and no Indigenous People were identified in this area.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	Whilst the Entity is committed to protecting Cultural and Sacred Heritage, the Criterion is not applicable as it is located in an industrial area designated by the local government where there are no Cultural Sacred Heritage sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	Whilst the Entity is committed to protecting Cultural and Sacred Heritage, the Criterion is not applicable as it is located in an industrial area designated by the local government where there are no Cultural Sacred Heritage sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located in the Changlong Industrial Park. Prior to the factory construction, the local government had completed the demolition and relocation of the original inhabitants. The Entity has no new project under construction or in planning that might impact physical and/or economic displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed an Indigenous People Protection Management Procedure stating respect for local communities' legal and customary rights and interests in their lands and livelihoods and use of natural resources. The Entity is located in Changlong Industrial Park, which was planned by the local government; there are no communities nearby. To date, no complaints from local communities have been received.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Sourcing Management Procedure, which includes a Supplier Audit Procedure for Conflict-Affected and High-Risk Areas. As per procedure requirement, the Responsible Purchasing Policy shall be communicated to all suppliers and contractors, and it covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. Responsible Purchasing Policy is available at: http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/19/65f95420ca019.pdf .
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Sourcing Management Procedure and Supplier Audit Management Procedure, including Conflict-Affected and High-Risk Areas management. On the base of the Sourcing Management Procedure, the Purchasing Policy has been implemented and communicated to all suppliers and contractors and covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. Using this framework, the Entity has identified and evaluated risks in its supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a Sourcing Management Procedure, which includes a Supplier Audit Procedure for Conflict-Affected and High-Risk Areas. As per procedure requirement, the Responsible Purchasing Policy shall be communicated to all suppliers and contractors, and it

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		covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. The Entity has designed and implemented strategies to address the identified risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has established a Sourcing Management Procedure that includes a Supplier Audit Procedure for Conflict-Affected and High-Risk Areas. The Entity conducts Due Diligence on its suppliers based on these management procedures. This ASI audit also meets the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established a Sourcing Management Procedure that includes a Supplier Audit Procedure for Conflict-Affected and High-Risk Areas. As per the Procedure guidelines, the Entity conducts its Due Diligence on suppliers and reports the supply chain Due Diligence annually. The annual supply chain Due Diligence report was last published in January 2024. The Entity's business or purchasing is not affected by Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	<p>The Entity has implemented security practices that respect Human Rights. Guard security procedures and an Employee Handbook are in place, defining how the security providers shall proceed to comply with respect to Human Rights. All security guards have been trained in the procedure.</p> <p>The Entity's ASI Governance Policy includes items four and five: 4. Guidelines for respecting Human Rights and promoting gender equality, and 5. Workplace Policy Free of Violence and Harassment, which is publicly available at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f95420ca019.pdf.</p> <p>The Entity has conducted a Security Risk Assessment. For more detailed information, refer to: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66028e7449bdb.pdf.</p> <p>A complaints/grievance channel is available to all stakeholders at: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/19/65f94e006df70.pdf.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Entity currently employs 210 people. Employees have established the Guangdong Betterlid Labour Union as a branch of Taishan City Sijiu Town Labour Union to ensure smooth communication with the Entity and local Federation of Labour Union. The Labour Union Constitution stipulates the union representative election process and the right to Collective Bargaining. However, Freedom of Association is not absolutely free in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	Employees have established the Guangdong Betterlid Labor Union as a branch of Taishan City Sijiu Town Labor Union to better communicate and negotiate with the Entity on behalf of employees' rights and interests.
10.2a-c Child Labour	Conformance	The Entity has established a Personnel Management System aligned with ILO Conventions C138 and C182, relating to Child Labour, which

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		defined that Child Labour under 15 may not be used, and it also prohibits underage Workers to be engaged in hazardous work. Communication with the Director of the Human Resources Department revealed that there is no employee under 18 years of age at the Entity.
10.3a-c Forced Labour	Conformance	<p>The Entity has established an Employee Management Procedure to define the prohibition of Forced Labour and publicly disclosed its Statement on Anti-Modern Slavery and Anti-Trafficking in Persons on its official website at: http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/26/66027fb5ad2f4.pdf.</p> <p>The Entity is not involved in Forced Labour, does not retain employees' personal effects and does not require lodge deposits or security payments.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Procedure, which stipulates that no person shall be hired without any restriction on ethnic minorities, foreigners, party affiliation, sex, race, political colour, sexual orientation, marital status, family responsibilities, age, or any other circumstances that may give rise to discrimination. The Entity has provided training on social responsibility to its employees.
10.5 Communication and engagement	Conformance	The Entity has established Communication, Participation, and Negotiation Control Procedures, providing that employees or employee representatives have the right to communicate openly with management to ensure that Workers can be reached in any work environment and can communicate with each other about the content of their negotiations, and to make suggestions or comments about their work environment and management practices without fear of discrimination, retaliation, threats or sexual harassment. The employee suggestion box and whistleblower's phone number are working and in use.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has publicly disclosed its latest ASI Governance Policy, which includes a commitment to eliminating violence and harassment, via item 5, Workplace Policy Free of Violence and Harassment: http://www.betterlid.cn/home/6/7/kxzm9/resource/2024/03/19/65f95420ca019.pdf.</p> <p>The Entity has established an Anti-Harassment Control Procedure, which stipulates a review is to be conducted annually and also when significant changes or defect events have occurred. Interviews with staff representatives, female operational staff, representatives of women's Trade Unions and supplier employees stated that there had been no incidents of Violence and Harassment at the Entity.</p>
10.7a-d Remuneration	Conformance	The Entity has established both a Compensation Management Procedure and an Attendance Management Procedure defined to make wage payments that are timely, in legal tender and fully documented. The Entity's calculation of overtime compensation meets the requirements of the local regulations, and samples of employees' overtime work schedules over a 12 month period confirmed that there were no violations. The average monthly overtime work time did not exceed 36 hours, which is stipulated in the Labour Law of the People's Republic of China.

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10.8a-c Working Time	Conformance	The Entity has formulated the Rules for the Control of Working Hours and Management of Voluntary Overtime Work, which specify working hours, holidays and paid annual leave in accordance with the relevant provisions of the National Labour Law. Samples of employees' overtime working hours records revealed no Non-Compliance.
10.9a-b Informing Workers of Rights	Conformance	The Entity has communicated with employees on their rights through the signing of the Labour contract and the signing of the Staff Handbook. Social Responsibility training was given to employees to include lawful, freely association information.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has established an Occupational Health and Safety (OH&S) Management System, compiled a Management Manual and procedural documents, and completed an internal Audit and management review of its EHS management system annually the OH&S Management System is independently certified to ISO45001:2018.</p> <p>However, at the time of the Audit, the Entity could not provide a summary evaluation report on the current status of hazards related to occupational disease. This situation does not conform to workplace occupational health regulations in China. Also, on-site sampled auditing found that some applicable laws and regulations, such as Regulations on the Management of Hazardous Chemicals, etc., were not identified and evaluated.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has established an OH&S Management System, has developed a management manual and procedural documents, and conducts an internal audit and management review of its OH&S Management System annually. The Entity has publicly disclosed the performance of its OHS Management System. Please refer to: http://www.betterlid.cn/home/6/7/kxom9/resource/2024/03/26/66027f9e45858.pdf.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has set up a production Occupational Health and Safety Committee and a Trade Union. This Occupational Health and Safety Committee is responsible for formulating or revising the production Safety Management System, organising regular production safety inspections, quarterly meetings, and record keeping. The Entity undertakes employee satisfaction surveys every year, collects suggestions or opinions on occupational health and safety put forward by employees, and gives feedback on the results of adoption. The Labour Union and Occupational Health and Safety Committee conduct investigations and analyses of employee work safety accidents, formulate improvement measures and implement them every year. The Entity has also developed a mechanism for identifying potentially hidden dangers, and employees at the shift level report weekly on potential OH&S dangers identified through self-inspection. The Occupational Health and Safety Committee organises corrections and verifies improvements implemented.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 June 2024	Initial Certification Audit - Full Certification
