

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

BINZHOU HONGZHAN ALUMINUM TECHNOLOGY CO., LTD.

CERTIFICATE
NUMBER

242

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

19 DECEMBER 2022

DATE OF EXPIRY

18 DECEMBER 2025

CERTIFIED SINCE

19 DECEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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

All operations and facilities of Binzhou Hongzhan Aluminum Technology Co., Ltd. in Binzhou City, Shandong Province, China. The facility is mainly engaged in the technical research and development, production and sales of aluminum sheet, strip and foil calendered products.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	China Hongqiao Group Co., Ltd.
ENTITY NAME	Binzhou Hongzhan Aluminum Technology Co., Ltd.
CERTIFICATION SCOPE	All operations and facilities of Binzhou Hongzhan Aluminum Technology Co., Ltd. in Binzhou City, Shandong Province, China. The facility is mainly engaged in the technical research and development, production and sales of aluminum sheet, strip and foil calendered products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">13 – 14 October 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 November 2022
AUDIT SCOPE	<p>The audit scope included all operations and facilities of Binzhou Hongzhan Aluminum Technology Co., Ltd. The facility is mainly engaged in the technical research and development, production and sales of aluminum sheet, strip and foil calendered products, which are mainly alloy cast and rolling roll, decorative plate, aluminum foil billet, battery foil billet, household foil, composite foil, and video foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

19 December 2022 –18 December 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

18 June 2024

CERTIFICATE
NUMBER

242

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has collected and identified the applicable legal and other requirements and has conducted compliance evaluations annually.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption established by the parent company Shandong Hongqiao New Material Co., are implemented and trained by the Entity.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that addresses the principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is available at: https://mp.weixin.qq.com/s?_biz=Mzg3NTgwMDgwOQ==&mid=2247483761&idx=1&sn=ec3db4e9c16594df285f1ac71d8cb910&chksm=cf3ab0f7f84d39e114558522cd914bfbc28a44711d81e312d62d8df8aa2e36fce0fa0875c5&token=2039777320&lang=zh_CN#rd
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented the Environmental, Social and Governance Management Policy of the parent company Shandong Hongqiao New Material Co: https://mp.weixin.qq.com/s?_biz=Mzg3NTgwMDgwOQ==&mid=2247483761&idx=3&sn=d295c4bcb5e2b38d8d217b8129ad4bf&chksm=cf3ab0f7f84d39e18c3de6579830dfa8adb91cd351f61a5d2cc6fe8ab0eb17db0ea6d2f04a9&token=2039777320&lang=zh_CN#rd
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrates a commitment to the Policy by providing the resources for implementation.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its Environmental, Social and Governance Management Policy to internal stakeholders through training and external stakeholders via the website: https://mp.weixin.qq.com/s?_biz=Mzg3NTgwMDgwOQ==&mid=2247483761&idx=3&sn=d295c4bcb5e2b38d8d217b8129ad4bf&chksm=cf3ab0f7f84d39e18c3de6579830dfa8adb91cd351f61a5d2cc6fe8ab0eb17db0ea6d2f04a9&token=2039777320&lang=zh_CN#rd
2.2 Leadership	Conformance	A senior Management Representative has been

CRITERION	RATING	COMMENT
		nominated with the responsibility for conformance with the ASI Performance Standard. The responsibility and authority of each department and key roles are defined.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Purchasing Policy that addresses the material environmental, social and governance aspects relevant to suppliers. The Policy is communicated to all suppliers and Contractors.
2.5 Impact Assessments	Conformance	The Entity has established the processes to conduct 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 happened since 2012.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certifications. The Entity has implemented the Emergency Response Plans developed in collaboration with stakeholder groups. The Emergency Response Plans on social, OH&S and environmental incidents have been implemented and personnel trained on the plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions. No such activity has occurred since the Entity commenced operation in 2012.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. No such case has occurred since the Entity commenced operations in 2012.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity reports via the Hongqiao China Group's annual Environmental, Social and Governance (ESG) Report: http://www.hongqiaochina.com/Uploads/File/2022/05/30/C1378-ESG.20220530182304.pdf

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity has not received any non-conformances from local authorities and this is disclosed in the ESG Report: http://www.hongqiaochina.com/Uploads/File/2022/05/30/C1378-ESG.20220530182304.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's payments to government are legally made. The Hongqiao China Group's Annual Report is publicly disclosed: http://www.hongqiaochina.com/Uploads/File/2022/09/26/C1378.20220926165455.pdf
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 established an internal and external whistleblowing/complaints/grievance mechanism that includes a 'whistleblower' hotline, mailing address, suggestion box, and QR code.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its Aluminium foil products and published the report: https://mp.weixin.qq.com/s/5IRV38_R96PsConaN7qrGw
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has conducted a cradle-to-gate LCA and provides public access to the LCA information and its underlying assumptions, including system boundaries.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has made available its environmental Life Cycle Assessment Report: https://mp.weixin.qq.com/s/5IRV38_R96PsConaN7qrGw
4.2 Product design	Conformance	The Entity has integrated relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product. For each product development process, energy consumption, the use of clean energy, waste reduction and recycling are taken into consideration. The targets for these relevant aspects have been defined.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and the target for the collection, recycling and/or reuse of scrap, is 100%. Process scrap is collected and sent to a smelter for recycling.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities and targets. The Entity communicates with the main customer to discuss how to improve the recycling rate of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no local, regional or national collection and recycling systems for aluminium scraps in China. The Entity works with the customer to decide how to improve the recycling rate of products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated its major Scope 1 and 2 Greenhouse Gas (GHG) Emissions and energy use by source and disclosed the data in the 2021 GHG Emissions Report, sections 2 and 3: https://mp.weixin.qq.com/s/SeZuCi3k59HaYz8SEocNQ GHG Emissions are not verified by a Third Party.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target to reduce GHG emissions from 0.65 tonne CO ₂ / tonne product in 2021 to 0.62 tonne CO ₂ / tonne product by 2027. The main strategy is to reduce electricity consumption and increase the scrap recycling rate. The Entity has disclosed this information in the GHG Emissions Target and Implementation Plan: https://mp.weixin.qq.com/s/Zb2Xq1JJGYFPnASrd-B_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 Entity has conducted an Environmental Impact Assessment to identify and quantify the Emissions to Air that have adverse effects on humans or the environment. The Entity has established the emissions treatment facilities required and the operational requirements to treat the emissions prior to release

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		and has monitored the air emissions at the required interval. The monitoring results in 2021 and 2022 indicate emissions are lower than the legal emission limit.
6.2 Discharges to Water	Conformance	Discharges to Water are addressed and managed within the Environmental Management System. The Entity has established water reduction targets and implemented a related plan to minimise adverse impacts. The wastewater monitoring reports indicated the major pollutants are monitored and results indicate pollutants meet the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where Spills and Leakage may contaminate air, water and soil has been undertaken by following the risk assessment process for the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the Emergency Response Plan for environmental incidents in which the control methods for the identified spill/leakage are defined. The required spill management facilities are in good order. The Entity has provided training on the plan to the relevant Workers and has conducted emergency drills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has defined the requirement to report Spills and Leakage in the Emergency Response Plan, which also addresses responsibilities and the reporting process. No Spills occurred in 2021 or 2022.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a process to ensure Impact Assessments associated with Spills and Leakages and the remedial actions taken are disclosed. No Spills or Leakage occurred in 2021 or 2022. The Entity has published the annual Environmental Performance Report 2021: https://mp.weixin.qq.com/s/9jYpVKuDJC8eReOQcSf80g
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The inventory of wastes generated in the operation is established and control methods for the different types of waste are defined. The main Hazardous Wastes are diatomite with oil and waste oil including rolling oil and mineral oil. The disposal of Hazardous Waste complies with legal requirements and is transferred to qualified suppliers

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		for disposal. Each transfer is registered with the Environment Protection Ministry. The transfers in 2021 and 2022 were audited and no non-compliance was found.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and the associated waste disposal methods are disclosed in the annual Environmental Performance Report: https://mp.weixin.qq.com/s/9jYpVKuDJC8eReOQcSf80g
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.
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 Aluminium recovered from the Dross pressing is recycled in the Entity's melting furnaces. The remaining is sold to external processors for recycling, which is used to produce Aluminium alloying ingots and cement materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the Dross pressing is

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		recycled in the Entity's melting furnaces for recycling the Dross residues. The remaining is sold to external dross processors for recycling, which is used to produce Aluminium alloying ingots and cement materials.
6.8c Dross (review of alternatives)	Conformance	There is no Dross residue sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use. The Entity only sources water from the municipal water supply and identifies the discharge and consumption source. The water balance analysis has been conducted.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment which considered the Entity's Area of Influence: https://mp.weixin.qq.com/s/FkOctVqA7Gu7k6y5Dr_Sg_g Due to the nature of the product and production processes in the local water environment, the level of water-related risk was identified as low.
7.2a Water management (management plans)	Conformance	There were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Conformance	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 has disclosed its Water Resources Risk Assessment report: https://mp.weixin.qq.com/s/FkOctVqA7Gu7k6y5Dr_Sg_g
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Biodiversity assessment is included in the Entity's Environmental Management System. The assessment involved qualified Third Parties and the report was approved by the local Environmental Protection Bureau. The risk and impact were assessed as low. Further information is available in the Biodiversity Risk Assessment Report: https://mp.weixin.qq.com/s/dm35DXoxH1MXUzO8Bw_0mDw
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2b Biodiversity management	Not Applicable	This Criterion is not applicable as the outcome of the

CRITERION	RATING	COMMENT
(consultation and mitigation hierarchy)		biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.3 Alien Species	Conformance	The Entity has identified the risk of introducing Alien Species within its Biodiversity Risk Assessment Report, which is limited to the use of wooden pallets and 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.
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 an ASI Policy that addresses its commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and a Due Diligence process is established. Management procedures for the protection of women Workers and the Local Community are established. A risk assessment of Human Rights and business ethics has been conducted. Suppliers’ audits have been conducted and no major impact is reported.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channels to stakeholders. A remediation process for any adverse Human Rights impact have been established. No major impact has been reported.
9.2 Women’s Rights	Conformance	Women’s legal rights and interests are respected by the Entity. The Entity has implemented policies and processes to ensure respect for the rights and interests of women, consistent with international

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		standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy has been established and communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples. However, policies and processes to ensure respect for the rights and interests of Indigenous Peoples has been established.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples. However, policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) has been established.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there is no cultural or sacred heritage. However, polices and procedure to protect cultural and sacred heritage has been established.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there has been no Resettlement, with all land purchased from the local government, no expansion plans, and no Indigenous Peoples involved. However, the Entity has established a management procedure for resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there has been no Resettlement, with all land purchased from the local government, no expansion plans, and no Indigenous Peoples involved. However, the Entity has established a management procedure for resettlements.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impacts on Local Communities are established and implemented. No complaint from the Local Communities has been received.
9.7b Local Communities (impacts)	Conformance	The Entity has identified and assessed the impact on the Local Communities. The control measures for the identified impacts on Local Communities are established and implemented. There has been no complaint from the Local Communities received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests. The Entity is active in community engagement and provides a positive impact on the communities.
9.8 Conflict-Affected and High-Risk	Conformance	The Entity makes a commitment to not using conflict

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Areas		minerals and communicates it through the Aluminium value chain. No conflict minerals are used by the Entity during production.
9.9 Security practice	Conformance	The Entity is involved with public and private security providers and commits to respect Human Rights in accordance with the ASI Performance Standard and good practices. The management procedure on the duties of security workers includes the primary role of security workers which is to protect people, property and/or assets, and to respect Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining. There are three freely elected Worker representatives, including one woman.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. Although there are no Collective Bargaining Agreements in the Entity, a Policy for respecting the right to Collective Bargaining has been implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws that restrict Freedom of Association and Collective Bargaining in China. The Entity has demonstrated respect for Freedom of Association and Collective Bargaining and has freely elected representatives, including one woman and these Worker representatives can deal with the Workers' concerns with management on behalf of the Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. There is no Child Labour or young Workers in the Entity. The minimum working age is 16. The age of candidates is verified by checking identity cards and via interview.
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 are not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. 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 has implemented a Policy of prohibition against Forced Labour including Human Trafficking. The Policy is communicated internally and to

CRITERION	RATING	COMMENT
		suppliers.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour. Workers are not required to provide any form of deposit, Recruitment Fees or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	There are no Migrant Workers at the Entity.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans to Workers. Labour contracts signed between the facilities and Workers do not include terms related to Debt Bondage, and payslips indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an Employee Manual that defines there is no restriction on Workers' movement at the Entity. This was verified through interviews with Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has defined within the management procedure on Forced Labour and the Employee Manual, that the retention of Workers' original documents is prohibited. Only copies of original documents are kept in Workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. Workers are free to terminate their employment at any time without penalty, given notice of thirty days in advance or three days in the period of probation, in compliance with the Labour Contract Law.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-discrimination. No case of discrimination has been received. Recruitment advertisement and training plan indicate no discrimination during hiring or provision of training opportunities. The interviewed women workers confirm that they feel equal with male workers.
10.5 Communication and engagement	Conformance	The Entity has regular meetings between Worker representatives and senior management, a grievance and complaints hotline, and has implemented operating procedures to ensure communication and direct engagement with Workers regarding working conditions and resolution of workplace and compensation issues.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures including management procedures, complies with legal requirements and requires the confirmation of the involved Worker. Disciplinary

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		measures are defined and communicated to Workers.
10.7a Remuneration (living wage)	Minor Non-Conformance	The Entity has a wage structure that is clearly defined. The basic wage meets the legal minimum wage and the total payment meets the Workers' basic needs. However, an incorrect calculation of Overtime wages was identified.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and made to all Workers by bank transfer near the 1 st of the following month, seven days after the wage cycle.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded by a face-scanning attendance system. Working hours are monitored. However, the leave benefits for female Workers over seven months pregnant do not meet legal requirements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy, which is reviewed periodically and communicated with Stakeholders. The Entity holds a valid ISO 45001:2018 certification and the recent surveillance audit did not raise any major non-conformities.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Minor Non-Conformance	The OH&S Policy is applied to Workers and visitors in compliance with the legal requirements and the requirements of ISO 45001:2018. However, the Entity did not ensure that the two Workers that required a medical re-examination received this examination.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has implemented systems to identify all applicable legal and related requirements and evaluate legal compliance at least annually.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training courses to understand the hazards, OH&S risks and actions determined as relevant for them and their right to refuse unsafe work. The Entity has a measure to protect Workers from undue consequences for stopping unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certification.
11.3 Employee engagement on	Conformance	The Entity has implemented a system of Workers'

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health and safety		consultation and participation in health and safety, in conformance with ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&S issues by themselves, or via the Worker representative. The management responds to the concerns and advice from Workers on OH&S issues.
11.4 OH&S performance	Conformance	The Entity has established and documented six Occupational Health and Safety targets in the OH&S Program. The implementation programs are established and implemented. The achievement status of the targets is monitored periodically. Currently, the implementation of the management programs for the OH&S targets is on track.

Document Control and Version History

Revision	Date	Notes
0	19 December 2022	Initial Certification Audit – Full Certification