

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000517

SITE DETAILS

Site: **Luxshare - Lanto (399) Kunshan, China**

Address: No.399, Baisheng Road, Jinxi Town, Kunshan City, Jiangsu Province China, 215324, Kunshan, CHINA

Contact Person: Paul Zhou

AWS Reference Number: AWS-000522

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Gold

Date of certification decision: 2023-Jul-03

Validity of certificate: 2026-Jul-02

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2023-Feb-14

Lead Auditor: Layla Chen (TUV Rheinland)

Audit team participants:

Lingyun Yu (TUV Rheinland)

Site Participants:

Chen Chen, QS Engineer

Cao Rujin, Chief of ES

Zhou Zhen, Sustainable Development Center Manager

Zhou Ke, M&E Engineer

Qin Xikai, M&E Chief

Xing Yabo, M&E Manager

Gao Junqi, HR Manager

Hong Yiling, CSR Manager

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

ADDITIONAL INFO

Summary of Audit Findings: A total of 1 finding was raised during the certification audit, 0 major non-conformity, 1 minor non-conformity, 0 observation.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends certification of Lanto Electronic Ltd. at Gold level approval of the corrective actions plan.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Lanto Electronic Ltd. against the AWS International Water Stewardship Standard Version 2. The Business Registration Address/ Business Operation Address was No. 399 Baisheng Road, Jinxi Town, Kunshan City, Jiangsu Province, China, the Business Production Address was No. 399 Baisher Road, Jinxi Town, Kunshan City, Jiangsu Province, China; No. 299 Baisheng Road, Jinxi Town, Kunshan City, Jiangsu Province, China; and No. 133 Jinyu Road, Jinxi Town, Kunshan City, Jiangsu Province, China. The factory covers three neighbour sites, covering an area of 334000 square meters. At present, the number of employees are about 6800. The site is a design and produce of cable, connectors, antenna, wireless charger and other electronic components. The total capability is 20496500000 pcs/year. The facility is located in the Kunshan Section of Wusong River Basin. The audit was conducted on 14th to 16th February 2023. The audit activities included the site visit covered production lines, wastewater treatment plant, chemical warehouse and IWRA, stakeholder interviews and documents review. A 0.5-day stakeholder interview was performed on 15th February 2023, and the following external stakeholders were interviewed during the audit: Customer/Mrs. Chen; Supplier / Mr. Neighborhood factory / Mr. Yan; Neighbor community/Mrs. Fei; Neighbor community/Mrs. Liu; Employee/ Mr. Zhang; Employee/Mrs. Ai; Employee/Mr. Li.

SCORE

60.00

FINDINGS

Minor	1
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CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

FINDING DETAILS

Finding No:	TNR-003766
Checklist Item No:	3.2.1
Status:	Open
Finding level:	Minor
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	<ol style="list-style-type: none">1. No secondary containment was available for the chemical in Pure water room, there was a rainwater wells and domestic sewage outfalls around there was a risk of contaminating rainwater and domestic sewage.2. There was a rainwater well in the temporary storage area of kitchen waste in the living area of Zone D, there was a risk of contaminating rainwater.
Corrective action:	<ol style="list-style-type: none">1. Install anti-leakage groove at the bottom of the dosing barrel.2. Immediately transfer the misplaced kitchen waste bins to the designated place; Conduct publicity and guidance training for the restaurant staffs and inform them the risks that may arise; Put up a "No kitchen Waste Prevention" notice in the household refuse area D.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Report Details

Report	Value
Report prepared by	
Report approved by	
Report approved on (Date)	

Surveillance

Proposed date for next audit
2024-Feb-16

Comment dd

Stakeholder Announcements

Date of publication	Location
14/01/2023	https://a4ws.org/wp-content/uploads/2023/01/AWS-000522-Luxshare-Lant-o-2022-Stakeholder-Announcement-TUV.pdf
13/01/2023	https://www.tuv.com/content-media-files/greater-china/about-us/downloads/terms-and-conditions-and-certification-regulations/aws-stakeholder-announcement-tuvgd-lanto-electronic-ltd.pdf
13/01/2023	https://www.luxshare-ict.com/Upload/File/201712/ksws.pdf

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Catchment Information

Catchment Information

The plant used the water by the municipal water for domestic and production from the local water company and used recycle water from wastewater for production and used rain water for afforestation watering. The municipal water plant has two sources (Yangtze River and Kuilei Lake). The industry wastewater is treated by onsite wastewater treatment plant and reused after the onsite treatment, not discharge. The domestic wastewater is discharged into a wastewater treatment plant (Kunshan Jinxi Sewage Treatment Plant) and finally discharged into the Wusong River. The rainwater is discharged into the municipal rainwater pipeline and then finally flows to Baijiadang Lake and its tributaries.

Based on the location of water source, final discharge receiving body and the boundary of the factory, all of them located in the Kunshan Section of Wusong River Basin. The length from west to east of the Wusong River in Kunshan City is about 40 kilometers, entering Kunshan from Suzhou Industrial Park (Jianglizhuang Section under provincial control), and passing through Kunshan and then enters Shanghai (Shipu section under state control). The Wusong River is an important river in the Jiangsu Province, which origins from the Lake Taihu and flows to the Shanghai then into the sea. Wusong River is a sub-catchment of Taihu Lake Catchment.



site catchment map.jpg

Client Description and Site Details

Client/Site Background

Lanto Electronic Ltd. has three blocks, whose address are No. 399 Baisheng Road, Jinxi Town, Kunshan City, Jiangsu Province, China; No. 299 Baisheng Road, Jinxi Town, Kunshan City, Jiangsu Province, China; and No. 133 Jinyu Road, Jinxi Town, Kunshan City, Jiangsu Province, China respectively. All three blocks are adjacent.

The site covers an area of 334000 m². At present, the number of employees are about 6800. The site is a design and produce of cable, connectors, antenna, wireless charger and other electronic components. The total capability is 20496500000 pcs/year. The domestic water is used from municipal tap water, production water is from municipal tap water and recycle water from wastewater. The industry wastewater is treated by onsite wastewater treatment plant and reused after the onsite treatment, not discharge. The domestic wastewater is discharged into a wastewater treatment plant (Kunshan Jinxi Sewage Treatment Plant) and finally discharged into the Wusong River. The rainwater is discharged into the municipal rainwater pipeline and then finally flows to Baijiadang Lake and its tributaries.

CERTIFICATION REPORT

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Audit Number: AO-000517

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Lanto faced with follow shared water challenges:

1. The standards such as water efficiency/sewage discharge are increasingly.
2. Increased water and wastewater costs
3. Deterioration of water quality in the basin (including surface water and groundwater).
4. Water Shortage.
5. Fragile ecosystem.
6. Extreme weather, such as drought, flood, etc.

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 Eligibility Criteria

0.1.1.1 The site(s) occupy one catchment OR an exception has been granted.


Yes

0.1.1.2 The scope of the proposed certification shall be under the control of a single management system.


Yes

0.1.1.3 The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.


Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.



Yes

Comment The site has developed a site and catchment background report. In this report, it contains following content:

- Site boundaries
- Water-related infrastructure, including the pipe network, owned or managed by the site or its parent organization.
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and wastewater service provider.
- The catchment(s) that the Site affects and relies on for water.

All domestic and production water used by Lanto is municipal tap water. The municipal tap water is supplied by Kunshan Water Group Co., Ltd., which is affiliated with Kunshan Water Affairs Group Co., Ltd. It has dual water sources of the Yangtze River and Kuilei Lake, and a daily water supply capacity of 1.5 million cubic meters. The water supply covers 927 square kilometers of the city.

The wastewater is discharged into Kunshan Jinxi Sewage Treatment Plant (the municipal WWTP) and finally discharged into the Xiaojieing River. The rainwater is discharged into the municipal rainwater pipeline and then finally flows to Baijiadang Lake and its tributaries. The water source, discharged water receiving body and the site, are located in Wusong River Basin. The length from west to east of the Wusong River in Kunshan City is about 40 kilometers, entering Kunshan from Suzhou Industrial Park (Jianglizhuang Section under provincial control), and passing through Kunshan and then enters Shanghai (Shipu section under state control). The Wusong River is an important river in the Jiangsu Province, which origins from the Lake Taihu and flows to the Shanghai then into the sea. Wusong River is a sub-catchment of Taihu Lake Catchment.

1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)






Audit Number: AO-000517

1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> <i>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> <i>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> <i>- Provide evidence of stakeholder consultation on water-related interests and challenges;</i> <i>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> <i>- Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	 Yes
Comment	<p>Lanto has established a stakeholder engagement procedure, HDSRP-050, identification scope of stakeholders is clarified.</p> <p>Lanto has identified stakeholders such as the government, employees, NGOs, surrounding residents, suppliers, infrastructures, and surrounding companies.</p> <p>Lanto has developed an analysis table of stakeholders, and has established diversified communication channels with different stakeholders, such as phone calls, e-mails, meetings, questionnaires, visits, supplier reviews, and government official websites.</p> <p>Lanto also consulted different types of stakeholders on the shared water challenge through questionnaires.</p>	
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Yes
Comment	<p>Lanto has developed an analysis table of stakeholders, the degree of influence between site and stakeholder has been identified of each stakeholder.</p>	
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>Lanto has developed a comprehensive response plan for environmental emergencies, including special emergency response plans for chemical and hazardous waste leakage and its decontamination wastewater treatment, waste water pipeline leakage, which are all related to water. The plan was registered with Kunshan Ecological Environment Bureau, No.320583-2022-0822-L; 320583-2022-0836-L; 320583-2019-0543-L.</p> <p>Lanto also developed an emergency preparedness and response operation procedure, HDSRP-011, including the emergency response process of wastewater treatment facilities, which identified wastewater leakage, equipment failure and other abnormal scenarios</p> <p>Lantao has also developed a water cut-off emergency plan, HDSRW-082, which identifies the response measures when production workshops, living quarters and other water use areas and facilities are facing water cut-off.</p> <p>In addition, according to seasonal climate change, Lanto has also developed an emergency plan for typhoon and rainstorm to cope with the upcoming extreme weather.</p> <p>Lanto prepares an emergency drill plan every year, which includes all the drill needs planned for the year (including water-related emergency drills), and the drill topics, participants, drill time, etc. are defined.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	<p>Lanto tracks the readings of each water meter every month and carries out water balance analysis every year.</p> <p>The site has recorded the income and input and output data via meter or estimation, and developed a water balance map based on the data. The water balance map reflected the water inflows, losses, reuses and outflows.</p>	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Yes
Comment	<p>Lanto has recorded the income and input and output data via meter or estimation and developed a water balance map based on the data. The water balance map reflected the water inflows, losses, reuses and outflows.</p> <p>The site tracks the readings of each water meter every month and carries out water balance analysis every year. The input, loss, storage and output of water are quantified.</p> <p>As per review of the water balance map, the annual water consumption in 2022 was 1.4 million cubic meters approximately. The site used water mainly on cooling tower and domestic use (dormitory, canteen and office building). The biggest consumption process was domestic consumption, and the biggest loss was cooling tower. The leakage rate was 1.2%.</p>	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	<p>Lanto has developed a water-related quality monitoring plan, including rainwater, domestic wastewater and drinking water, as follows:</p> <ul style="list-style-type: none"> • Rainwater is tested by an external qualified laboratory every six months • Drinking water is tested by an external qualified laboratory once a year • Domestic waste water is tested by an external qualified laboratory once a year <p>Purified water is used in the production process of the site. Lanto carries out RO purification treatment for municipal water. Annually, the site entrusts a qualified laboratory to test the purified water for production according to GB/T 114461997, EW-II standard. The conductivity of the purified water for production is monitored in real time internally to ensure that the water quality meets its process requirements.</p>	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>Rainwater and domestic wastewater are discharged separately through different pipe networks. Lanto drew a rainwater and sewage pipe network diagram, and the rainwater and wastewater transmission pipelines were mapped.</p> <p>Lanto also drew a map of potential pollution sources, wastewater treatment facility, waste storage areas and chemical storage areas were identified. The site also identifies the pollution factors of each potential pollution source.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment	Lanto identified Baijiadang Lake as its on-site IWRA. Baijiadang is a small lake with a total circumference of 2.24 kilometers and a water area of about 140674 m3. Area D of the site is adjacent to Baijiadang, and area E of the site is surrounded by Baijiadang and its tributaries. The site irregularly maintains the water surface sanitation and salvages the floating objects on the water surface.	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	Yes
Comment	Lanto has identified the annual water-related costs, including water consumption costs, operating costs and depreciation of water treatment facilities, domestic drainage costs, water quality monitoring costs, etc	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	Yes
Comment	Lanto provides dormitories and canteen for employees. Sanitation and hygiene installations and water purifiers are also installed at office buildings, dormitory areas and all workshops. The WASH installations fully comply with the national "Hygienic Standards for the Design of Industrial Enterprises" (GBZ 1-2010). The standard included the requirement such as number of available toilets, separate toilets for Male and female, privacy and hygiene facility of toilets. The site also conducts WBCSD self-assessment to evaluate the level of onsite WASH. The result is satisfied.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	Yes
Comment	Lanto has screened and identified the suppliers accounted for 5 percent of product weight, and some significant chemical suppliers, and then sent the questionnaires to investigate their indirect water consumption. Moreover, by using WWF's map of water risk filter, Lanto also evaluated the water related risk level in the catchment where its suppliers are located.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	Yes
Comment	Lanto also collects the water consumption of its outsourced services such as hazardous waste disposal units through questionnaires or query from their official websites.	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment Lanto has screened and identified the suppliers accounted for 5 percent of product weight, and some significant chemical suppliers, and then sent the questionnaires to investigate their indirect water consumption. Moreover, by using WWF's map of water risk filter, Lanto also evaluated the water related risk level in the catchment where its suppliers are located. Lanto also collects the water consumption of its outsourced services such as hazardous waste disposal units through questionnaires or query from their official websites. According to the collected information, the embedded water use of primary inputs in catchment(s) of origin could be quantified. As per the data, the biggest indirect water unit is the procurement of magnet, and it consists of 89% of the indirect water consumption.

Score 7

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*

 Yes

Comment Water governance initiatives was identified in Catchment Background Survey Report by Lanto; The initiatives included national, provincial and local level, including the catchment development plan, industrial development plan, environmental and ecological conservation plan etc.

1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*

 Yes

Comment The site presents a matrix recording all legal actions, this document is used by the site to monitor the status of each of the site's legal obligations.

1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.*

 Yes

Comment The Catchment Background Survey Report provides a detailed analysis of water balance for the catchment.

The water balance in the catchment is analysed based on the rainfall (mm), precipitation (m3), surface water resources (m3), groundwater resources(m3), water diversion (m3), displacement(m3), storage(m3), consumption(m3) □total water supply (m3) and total water consumption(m3). All the data is collected from government website and publishing report.

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*







 Yes

Comment The Catchment Background Survey Report provides a detailed analysis of water quality for the catchment. The site obtained the relate information from the government website. (Mainly from the Environmental and Ecological Bureau). The data includes the water quality of the water source, the final discharged water body, the water from municipal water plant. The data will be published monthly, therefore, the annual variances could be identified.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)





Audit Number: AO-000517

1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	<p>The Catchment Background Survey Report lists the Important Water-Related Area of the catchment.</p> <p>The Important Water-Related Areas are collected from government published documents, including 'Ecological protection red line of Kunshan City', 'Ecological environment zoning of three lines and one list'.</p> <p>The status of the IWRAs are collected from the manage authorities.</p> <p>Based on the catchment background survey report, the catchment included 14 IWRAs, and it can be divided by three categories.</p> <p>1. The Wetland ecosystem: i.e., Yangcheng Lake (Kunshan) Wetland; Dianshan Lake (Kunshan City) Wetland</p> <p>2. Water source and quality protection: i.e., Kuilei Lake Drinking Water Source water protection Area</p> <p>3. Natural and cultural landscapes: i.e., Kunshan Urban Ecological Forest Park; Tinglin Scenic Area</p> <p>Currently, none of them faced significant threats.</p>	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	<p>The Catchment Background Survey Report lists the existing and planned water-related infrastructure including water supply, flood control and drainage, wastewater treatment, emergency response at provincial, catchment and city levels and water-related objectives.</p> <p>Based on the available information, the water-related infrastructure in the catchment is relatively good.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	<p>The facility obtained the WASH status in Kunshan from Kunshan Statistical Yearbook for 2021, including the tap water penetration rate □100%□, wastewater treatment rate □94.08%□ and other data. Overall, the WASH services is good in Kunshan City.</p>	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 No
Comment	<p>The facility does not perform this indicator.</p>	
1.5.9	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 No
Comment	<p>The facility does not perform this indicator.</p>	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment	<p>The Catchment Background Report identifies the shared challenges within the catchment, including:</p> <ol style="list-style-type: none"> 1. The standards such as water efficiency/sewage discharge are increasingly. 2. Increased water and wastewater costs 3. Deterioration of water quality in the basin (including surface water and groundwater). 4. Water Shortage. 5. Fragile ecosystem. 6. Extreme weather, such as drought, flood, etc. <p>Meanwhile, based on the analysis of relevance/rationale for stakeholders and relevance/rational for the site, the sites has prioritized the shared challenges.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>Initiatives to address shared water challenges are included in the Catchment Background Report identifies the shared challenges within the catchment.</p> <p>They include following:</p> <ol style="list-style-type: none"> 1. The site develops water-saving technologies at the source, improves water resource utilization, and reduces water intake and consumption. 2. The site implements "zero discharge of production wastewater" and ensures that 100% of domestic sewage is discharged up to standard. 3. The site strictly implements the management system of rainwater and sewage diversion, and prohibits wastewater from being discharged into the rainwater pipeline network. 4. The site implements "zero discharge of production wastewater" and ensures that 100% of domestic sewage is discharged up to standard. 5. The site has developed a water quality monitoring plan to monitor the discharge of domestic sewage and rainwater annually. 6. The site reduces its impact on the environment by implementing energy-saving and emission reduction projects. 7. The site has formulated emergency measures to deal with extreme weather such as typhoon and rainstorm. 	
1.6.3	<p><i>Advanced Indicator</i></p> <p><i>Future water issues shall be identified, including anticipated impacts and trends</i></p>	 No
Comment	The facility does not perform this indicator.	
1.6.4	<p><i>Advanced Indicator</i></p> <p><i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i></p>	 No
Comment	The facility does not perform this indicator.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000517

Comment	Lanto has developed a risk and opportunity response control procedure, HDQMP-009, which specifies the criteria for risk identification, severity and potential impact. Lanto has identified its water risks covering water governance, sustainable water balance and water quality. Based on risk analysis, Lanto has prioritized its water risks according to potential impact, likelihood within a given time and difficulty of detection. Meanwhile, corresponding response strategies to mitigate water risks are developed.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	✓ Yes
Comment	Lanto has developed a risk and opportunity response control procedure, HDQMP-009, which specifies the risk and opportunity identification process. Lanto identified water-related opportunities including cost saving, image enhancement, sustainability of enterprise operation, and customer trust, and ranked their importance.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	✓ Yes
Comment	Lanto has identified relevant catchment best practice for water governance including: <ul style="list-style-type: none"> • A comprehensive water stewardship plan that is routinely reviewed and updated; • Training of employees on the principles of water stewardship; • Engaging with peer organizations and stakeholders to promote water stewardship; • Communicating on its own water stewardship to set a leading example to others. 	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	✓ Yes
Comment	The site has identified relevant sector and/or catchment best practice for water balance including: <ul style="list-style-type: none"> • Rainwater recovery • Train workers on how to improve efficiency, and on basic daily activities, such as switching off taps; • Install water efficient fittings, for example for toilets, wash rooms, equipment washing facilities, bath installations, etc. • Classify industrial wastewater with different concentrations to improve wastewater treatment efficiency and wastewater reuse ratio 	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	✓ Yes
Comment	The site has identified relevant sector and/or catchment best practice for water quality, such as: <ul style="list-style-type: none"> • Test the rainwater regularly to monitor whether it is polluted • Industrial wastewater is reused after treatment without discharge • Formulate internal control standards stricter than discharge permit for domestic wastewater 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	✓ Yes
Comment	The site has identified best practices related to Important Water Related Areas (IWRA). Such as water quality monitoring of neighbour river, or conducting the river cleaning activities.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*  **Yes**




Comment The site has identified relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services including:

- WBCSD self-assessment tool
- GB 5749 Sanitary Standard for Drinking Water
- GBZ 1-2010 Hygienic standards for the design of industrial enterprises
- GB 31177-2014 Hygienic requirements and management specifications for student dormitory

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

2		STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> <i>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> <i>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> <i>- That the site's stakeholders will be engaged in an open and transparent way</i> <i>- That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	A water stewardship commitment to follow all the AWS core criteria has been signed by the top manager of Lanto. The commitment has been displayed on LUXSHAREICT group's website.	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i></p>	 Yes
Comment	<p>A water stewardship commitment to follow all the AWS core criteria has been signed by the top manager of Lanto. The commitment has been displayed on LUXSHAREICT group's website.</p> <p>https://www.luxshare-ict.com/Upload/File/201712/%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E6%89%BF%E8%AF%BA-%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90.pdf</p>	
Score	1	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> <i>- Identification of responsible persons/positions within facility organizational structure</i> <i>- Process for submissions to regulatory agencies.</i> 	 Yes
Comment	<p>Lanto disclosed the information of its water management organizational structure and members of the compliance responsible team on the official website of LUXSHAREICT Group.</p> <p>Lanto has prepared its own sustainable water stewardship operation procedure, HDSRP-050, which defines the water management responsibilities of each department. Lanto has also established a procedure to ensure the operation of Lanto meet the provisions of relevant laws, regulations and other requirements, HDSRP-004.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	Yes
Comment	<p>Lanto has developed a water stewardship strategy and announced it on its official website. The strategy expounds Lanto's long-term plan for water stewardship in terms of standardized management, corporate social responsibility and implementation of best practices, including:</p> <ul style="list-style-type: none"> • Scientific compliance: abide by laws and regulations, establish a scientific and sustainable water stewardship system, and continuously improve water efficiency through continuous improvement of management system and technical level • Balance health: actively achieve sustainable water balance and reduce water waste and loss; Ensure good and healthy water quality and continuously improve water pollution prevention and wastewater treatment measures • Adequate hygiene: strengthen communication and interaction among internal stakeholders, strive to provide sufficient and safe drinking water and sanitation facilities, identify water risks including water shortage and develop countermeasures • Basin protection: support and cooperate with local and basin level water resources management planning, help protect water resources in the basin, and constantly improve communication and information disclosure with external stakeholders 	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 	Yes
Comment	<p>Lanto has developed a Water Stewardship Plan (Year 2022), which specifies targets, required actions, measurement, status, effectiveness evaluation, accountable and deadline, etc.</p> <p>The Water Stewardship Plan is associated with five main outcomes of AWS, including good water governance, sustainable water balance, good water quality status, IWRA and WASH, such as:</p> <ul style="list-style-type: none"> • Prepare and regularly update the sustainable water stewardship procedure to standardize the water management process of the plant • Improve staff's water management awareness through training and posting water-saving signs • Improve the indirect water use performance of the site by carrying out water management training for suppliers and promoting them to remove IPE violation records • Optimize the production process, reduce the water consumption per unit product, and increase the proportion of wastewater reuse • Monitor the water quality of the site IWRA, Baijiadang • Use WBCSD to evaluate the WASH of the site and reach 95% 	
2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment In September 2022, Lanto organized a sharing seminar on sustainable water stewardship to share its experience in carrying out AWS with brother companies in the same catchment and advocate to jointly carry out sustainable water management in the catchment. Lanto cooperates with the local river protection office, Jinxi Water Conservancy Station to clean up and maintain the Baijiadang Lake around the site.

Score 4

2.3.4 *Advanced Indicator* ✔ Yes
The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.

Comment In September 2022, Lanto organized a sharing seminar on sustainable water stewardship to share its experience in carrying out AWS with brother companies in another catchment and advocate to jointly carry out sustainable water management in the catchment.

Score 4

2.3.5 *Advanced Indicator* ✔ Yes
Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.

Comment Lanto identified Baijiadang Lake as its on-site IWRA. The site cooperated with Jinxi Water Conservancy Station to maintain the sanitation of Baijiadang Lake. The site signed a cooperation agreement with the municipal service unit designated by Jinxi Water Conservancy Station to maintain the sanitation of Baijiadang Lake.

Score 7

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.* ✔ Yes

Comment Lanto has identified its water risks covering water governance, sustainable water balance and water quality. Based on risk analysis, Lanto has prioritized its water risks according to potential impact, likelihood within a given time and difficulty of detection. Meanwhile, corresponding response strategies to mitigate water risks are developed, such as:

- A series of business continuity control procedures have been developed by referring to water quality and water supply emergencies identified by water-related infrastructure
- The emergency plan for sudden environmental events has been formulated, including special emergency plans for chemical and hazardous waste leakage and its disposal of cleaning waste water, waste water pipeline leakage, etc., and has been registered with Kunshan Ecological Environment Bureau, No. 320583-2022-0822-L; 320583-2022-0836-L; 320583-2019-0543-L

2.4.2 *Advanced Indicator* ✗ No
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Comment The site does not perform this indicator.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>Lanto actively cooperates with the government supervision department to conduct supervisory inspections and visits.</p> <p>Lanto also actively cooperates with various government-led water-related plans, such as water application, water balance test, annual industrial water reuse rate survey, cleaner production audit, and water-saving personnel training.</p> <p>The site actively participates in various meetings organized by the government and maintains active communication with government departments</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The water rights are respected under legal and regulatory mechanisms, and there is no indigenous people in the catchment area.</p>	
3.1.3	<i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	 Yes
Comment	<p>The site has developed its own sustainable water stewardship operation procedure, HDSRP-050, to standardize its water management activities</p> <p>The site maintains the qualification status of its environmental protection personnel, and develops a qualification development plan for them, including water treatment operator certificate, water quality inspector certificate, and environmental protection engineer certificate</p> <p>On September 2, 2022, the site carried out internal AWS management training to improve the water management ability of managers and better implement the AWS system</p> <p>On February 17-18, 2022, the site invited a third party to carry out a two-day training on water management standards to help it implement and improve its water management system</p> <p>On May 27-28, 2021, the site sent its water management director to participate in the "water saving specialist" training course held by Kunshan Water Conservation Office, and obtained the "water saving specialist" training certificate</p>	
Score	2	
3.1.4	<i>Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i>	 Yes
Comment	<p>In 2022, Lanto was rated as "Suzhou Environmental Protection Demonstration Enterprise and Public Institution" by Suzhou Ecological Environment Bureau</p>	
Score	2	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 No

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment Lanto has obtained the necessary water-related permit and license, like pollutant discharge registration (No. 91320583761006909D001Z, valid from 2020-03-09 to 2025-03-08). Lanto has established a procedure to ensure the operation of Lanto meet the provisions of relevant laws, regulations and other requirements. With the help of a third-party platform, Lanto timely obtains updated information on laws and regulations, and conducts compliance evaluation on laws and regulations every year and keeps records.

Finding No: TNR-003766

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*



Yes

Comment Lanto has established a procedure to ensure the operation of Lanto meet the provisions of relevant laws, regulations and other requirements. With the help of a third-party platform, Lanto timely obtains updated information on laws and regulations, and conducts compliance evaluation on laws and regulations every year and keeps records. As the impact on the environment is small, Lanto does not need to apply for a pollution discharge permit, but only needs to carry out a fixed pollution source pollution discharge registration. The site has developed a water quality monitoring plan, including rainwater and domestic wastewater, to ensure that the drainage water quality meets the requirements of laws and regulations. The site entrusts a third party laboratory to test its rainwater every six months and to test its domestic wastewater once a year.

3.3 *Implement plan to achieve site water balance targets.*

3.3.1 *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*



Yes

Comment After being treated by the internal wastewater treatment facilities, the industrial wastewater of the site is all reused in the production process, and no industrial wastewater is discharged. The high concentration tin mesh cleaning waste liquid in Lanto's workshop is directly treated as hazardous waste. The site has developed a Water Stewardship Plan (Year 2022) improvement action list, which specifies targets, required actions, measurement, status, effectiveness evaluation, accountable and deadline, etc. According to the 2019 water balance test report of the site, its water resource reuse rate is 89.8%. After that, the site monitors its wastewater reuse rate by itself according to the water balance test specification. Up to now, the data is about 92%. A series of project plans are implemented and continuously tracked, such as: Industrial water recovery technical transformation project to increase the water production capacity of the pure water system; Gradually replace with water-saving faucet; Reduce single water consumption of toilet water tank in staff dormitory.

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*







Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)





Audit Number: AO-000517

Comment	<p>After being treated by the internal wastewater treatment facilities, the industrial wastewater of the site is all reused in the production process, and no industrial wastewater is discharged. The high concentration tin mesh cleaning waste liquid in Lanto's workshop is directly treated as hazardous waste.</p> <p>According to the 2019 water balance test report of the site, its water resource reuse rate is 89.8%. After that, the site monitors its wastewater reuse rate by itself according to the water balance test specification. Up to now, the data is about 92%</p> <p>A series of project plans are implemented and continuously tracked, such as:</p> <p>Industrial water recovery technical transformation project to increase the water production capacity of the pure water system;</p> <p>Gradually replace with water-saving faucet;</p> <p>Reduce single water consumption of toilet water tank in staff dormitory.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	No legally-binding documentation is issued by local government authorities to the site for the re-allocation of water to social, cultural or environmental needs.	
3.3.4	<p><i>Advanced Indicator</i></p> <p><i>The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i></p>	 No
Comment	The site does not perform this indicator.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>A series of water stewardship plans are implemented to achieve the site's water quality targets.</p> <p>According to the water quality monitoring plan, the site entrusts a third-party laboratory to test its various water quality, such as: Drinking water, once a year; Rainwater, once every six months; Domestic wastewater, once a year. According to the test report and analysis record provided by the site, the water quality is 100% in line with its internal control standard</p> <p>The site entrusts a third party laboratory to monitor the quality of its process ultra-pure water every year. The site controls the quality of its pure water according to the EW Class II standard of industrial ultra-pure water quality standard of the People's Republic of China GB/T 11446-1997. At present, the pure water quality of the site has reached the EW Class I standard (more stringent than EW Class II)</p> <p>The site has formulated the operation standards of industrial wastewater treatment facilities to standardize the wastewater treatment process, and has kept the daily operation and maintenance records for tracking the operation status of wastewater treatment facilities</p> <p>The internal discharge standard of domestic wastewater is 80% of the discharge standard (the water quality standard of sewage discharged into urban sewers CJ343-2010 Class B standard). The factory entrusts a third party organization to test its domestic wastewater every six months. The discharge concentration of domestic wastewater in the factory is 100% in line with the requirements of its internal control index</p> <p>The site tracks the progress of its Water Stewardship targets regularly.</p>	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment	The internal discharge standard of domestic wastewater is 80% of the discharge standard (the water quality standard of sewage discharged into urban sewers CJ343-2010 Class B standard). The factory entrusts a third party organization to test its domestic wastewater every six months. The discharge concentration of domestic wastewater in the factory is 100% in line with the requirements of its internal control index	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Baijiadang, is a small lake with a total circumference of 2.24 kilometers and a water area of about 140674 m3. Area D of the site is adjacent to Baijiadang, and area E of the site is surrounded by Baijiadang and its tributaries. The site irregularly maintains the water surface cleanness and salvages the floating objects on the water surface. The site has developed a plan to monitor the water quality of Baijiadang. The site will entrust a brother company to test the water quality of Baijiadang in 2023. At present, the laboratory is under construction and is expected to be put into operation in March 2023.	
3.5.2	<i>Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.</i>	 No
Comment	The site does not perform this indicator.	
3.5.3	<i>Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.</i>	 No
Comment	The site does not perform this indicator.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment Lanto provides dormitories and canteen for employees. Sanitation and hygiene installations and water purifiers are also installed at office buildings, dormitory areas and all workshops. The site has formulated sanitary standards for toilets. Daily cleaning records and cleaning checklist are provided for review.

The site has formulated the water dispenser management procedure, HDSRW-091, which includes requirements for water quality monitoring, regular maintenance, daily cleaning and disinfection, and relevant records are retained for tracking.

The WASH installations fully comply with the national "Hygienic Standards for the Design of Industrial Enterprises" (GBZ 1-2010).

The site also conducts WBCSD self-assessment to evaluate the level of onsite WASH. The result is satisfied.

In addition, Lanto has also set up a variety of channels to collect employees' opinions and suggestions on their WASH and follow up these feedback in a timely manner, such as:

- The site conducts an employee satisfaction survey through questionnaires every year, summarizes and analyzes the survey results, and develops an action plan based on employee feedback.
- The site posted the QR code of the online satisfaction survey in the employee restaurant, and the employees can feedback their opinions on the restaurant hygiene, food safety and other aspects at any time.
- The site has set up an employee service hotline to follow up employees' feedback.
- The site has set up a "employee service" channel for employees on WeChat, and employees can timely feedback their opinions on WASH.

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*

 **Yes**

Comment No evidence is showed that the site is impinging on the human right to safe water and sanitation of communities through their operations according to the interviews with employees, local community and local government authorities.

3.6.3 *Advanced Indicator*
A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.

 **Yes**

Comment WASH is very good in Kunshan city. The site could not do the actions like providing the sanitation infrastructure to local community.

The site has set up a self-service drinking point and toilet for outsiders (not visitor), such as applicants, couriers, cleaner, and Jinxi Town Police Station at the No. 3 gate of its plant area. So, they can get free water or washroom while it is necessary.

Score 5

3.6.4 *Advanced Indicator:*
In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.

 **No**





Comment The site does not perform this indicator.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)





Audit Number: AO-000517

3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	<p>Lanto has not set indirect water use target.</p> <p>Instead, Lanto has screened and identified the suppliers accounted for 5 percent of product weight, some significant chemical suppliers and some significant service providers (such as hazardous waste disposal units), and then sent the questionnaires to investigate their indirect water consumption. Moreover, by using WWF's map of water risk filter, Lanto also evaluated the water related risk level in the catchment where its suppliers are located. The group level has screened all suppliers' IPE violation records, and promoted them to provide feedback to the IPE platform and remove the violation records. In 2022, the site followed up the violation records of 81 suppliers with violation records, and 60 of them completed the removal of violation records.</p> <p>In addition, the group level also promoted suppliers to disclose their PRTR (pollutant registered, transferred and released) information on the IPE platform. In 2022, it promoted 150 suppliers to disclose their PRTR data.</p>	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	<p>The group level has screened all suppliers' IPE violation records, and promoted them to provide feedback to the IPE platform and remove the violation records. In 2022, the site followed up the violation records of 81 suppliers with violation records, and 60 of them completed the removal of violation records.</p> <p>In addition, the group level also promoted suppliers to disclose their PRTR information on the IPE platform. In 2022, it promoted 150 suppliers to disclose their PRTR data.</p> <p>The site conducts on-site audits of its suppliers every year, covering topics related to environmental management. In 2022, the site conducted on-site audit on 110 suppliers. For the findings found during the audit, the site will promote the suppliers to follow up and rectify them.</p>	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Yes
Comment	<p>The group level has screened all suppliers' IPE violation records, and promoted them to provide feedback to the IPE platform and remove the violation records. In 2022, the site followed up the violation records of 81 suppliers with violation records, and 60 of them completed the removal of violation records.</p> <p>In addition, the group level also promoted suppliers to disclose their PRTR information on the IPE platform. In 2022, it promoted 150 suppliers to disclose their PRTR data.</p> <p>On the IPE platform (a well-known environmental information disclosure platform in China), the in the CITI (Corporate Information Transparency Index) of LUXSHAREICT group in 2022 ranked 16th among all industries and fourth in the IT/ICT industry</p>	
Score	7	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)





Audit Number: AO-000517

Comment	The site actively cooperates with the government supervision department to conduct supervisory inspections and visits. The site keeps close contact with local water-related infrastructure owners through many ways such as Wechat, e-mail or phone call.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	The site has developed its own sustainable water stewardship operation procedure, HDSRP-050, to standardize its water management activities On September 2, 2022, the site carried out internal AWS management training to improve the water management ability of managers and better implement the AWS system On February 17-18, 2022, the site invited a third party to carry out a two-day training on water management standards to help it implement and improve its water management system	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	After being treated by the internal wastewater treatment facilities, the industrial wastewater of the site is all reused in the production process, and no industrial wastewater is discharged. According to the 2019 water balance test report of the site, its water resource reuse rate is 89.8%. After that, the site monitors its wastewater reuse rate by itself according to the water balance test specification. Up to now, the data is about 92% A series of project plans are implemented and continuously tracked, such as: Industrial water recovery technical transformation project to increase the water production capacity of the pure water system; Gradually replace with water-saving faucet; Reduce single water consumption of toilet water tank in staff dormitory.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site entrusts a third party laboratory to monitor the quality of its process ultra-pure water every year. The site controls the quality of its pure water according to the EW Class II standard of industrial ultra-pure water quality standard of the People's Republic of China GB/T 11446-1997. At present, the pure water quality of the site has reached the EW Class I standard (more stringent than EW Class II) The site has formulated the operation standards of industrial wastewater treatment facilities to standardize the wastewater treatment process, and has kept the daily operation and maintenance records for tracking the operation status of wastewater treatment facilities The internal discharge standard of domestic wastewater is 80% of the discharge standard (the water quality standard of sewage discharged into urban sewers CJ343-2010 Class B standard). The factory entrusts a third party organization to test its domestic wastewater every six months. The discharge concentration of domestic wastewater in the factory is 100% in line with the requirements of its internal control index	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment	<p>Baijiadang, is a small lake with a total circumference of 2.24 kilometers and a water area of about 140674 m3. Area D of the site is adjacent to Baijiadang, and area E of the site is surrounded by Baijiadang and its tributaries. The site irregularly maintains the water surface sanitation and salvages the floating objects on the water surface.</p> <p>The site has developed a plan to monitor the water quality of Baijiadang. The site will entrust a brother company to test the water quality of Baijiadang in 2023. At present, the laboratory is under construction and is expected to be put into operation in March 2023.</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>Lanto provides dormitories and canteen for employees. Sanitation and hygiene installations and water purifiers are also installed at office buildings, dormitory areas and all workshops. The site has formulated sanitary standards for toilets. Daily cleaning records and cleaning checklist are provided for review.</p> <p>The site has formulated the water dispenser management procedure, HDSRW-091, which includes requirements for water quality monitoring, regular maintenance, daily cleaning and disinfection, and relevant records are retained for tracking.</p> <p>The WASH installations fully comply with the national "Hygienic Standards for the Design of Industrial Enterprises" (GBZ 1-2010).</p> <p>The site also conducts WBCSD self-assessment to evaluate the level of onsite WASH. The result is satisfied.</p> <p>In addition, Lanto has also set up a variety of channels to collect employees' opinions and suggestions on their WASH and follow up these feedback in a timely manner, such as:</p> <ul style="list-style-type: none"> • The site conducts an employee satisfaction survey through questionnaires every year, summarizes and analyzes the survey results, and develops an action plan based on employee feedback. • The site posted the QR code of the online satisfaction survey in the employee restaurant, and the employees can feedback their opinions on the restaurant hygiene, food safety and other aspects at any time. • The site has set up an employee service hotline to follow up employees' feedback. • The site has set up a "employee service" channel for employees on WeChat, and employees can timely feedback their opinions on WASH. 	
3.9.6	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 No
Comment	The site does not perform this indicator.	
3.9.7	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 No
Comment	The site does not perform this indicator.	
3.9.8	<i>Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Comment The site entrusts a third party laboratory to monitor the quality of its process ultra-pure water every year. The site controls the quality of its pure water according to the EW Class II standard of industrial ultra-pure water quality standard of the People's Republic of China GB/T 11446-1997(a recommended standard, not compulsory standard). At present, the pure water quality of the site has reached the EW Class I standard (more stringent than EW Class II)

The site has formulated the operation standards of industrial wastewater treatment facilities to standardize the wastewater treatment process, and has kept the daily operation and maintenance records for tracking the operation status of wastewater treatment facilities. The wastewater is discharged into municipal WWTP after onsite treatment. So the discharge standard is not quite stringent. The facility has set a more stringent internal discharge standard of domestic wastewater, whose limit equals to 80% of the legal discharge standard (the water quality standard of sewage discharged into urban sewers CJ343-2010 Class B standard).

The factory entrusts a third party organization to test its domestic wastewater every six months. The discharge concentration of domestic wastewater in the factory is 100% in line with the requirements of its internal control index.

Score 8

3.9.9 *Advanced Indicator*
Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.

 No

Comment The site does not perform this indicator.

3.9.10 *Advanced Indicator*
Achievement of identified best practice related to targets in terms of WASH shall be quantified.

 Yes

Comment Lanto provides dormitories and canteen for employees. Sanitation and hygiene installations and water purifiers are also installed at office buildings, dormitory areas and all workshops. The site has formulated sanitary standards for toilets. Daily cleaning records and cleaning checklist are provided for review.

The site has formulated the water dispenser management procedure, HDSRW-091, which includes requirements for water quality monitoring, regular maintenance, daily cleaning and disinfection, and relevant records are retained for tracking.

The WASH installations fully comply with the national "Hygienic Standards for the Design of Industrial Enterprises" (GBZ 1-2010).

The site also conducts WBCSD self-assessment to evaluate the level of onsite WASH. The result is satisfied.

In addition, Lanto has also set up a variety of channels to collect employees' opinions and suggestions on their WASH and follow up these feedback in a timely manner, such as:

- The site conducts an employee satisfaction survey through questionnaires every year, summarizes and analyzes the survey results, and develops an action plan based on employee feedback.
- The site posted the QR code of the online satisfaction survey in the employee restaurant, and the employees can feedback their opinions on the restaurant hygiene, food safety and other aspects at any time.
- The site has set up an employee service hotline to follow up employees' feedback.
- The site has set up an "employee service" channel for employees on WeChat, and employees can timely feedback their opinions on WASH.

Score 4

3.9.11 *Advanced Indicator*
A list of efforts to spread best practices shall be identified.

 Yes

CERTIFICATION REPORT


Alliance for Water Stewardship (AWS)

Audit Number: AO-000517


Comment The site has carried out several actions to promote its best practices in environmental or water-related fields, such as:

- Conduct AWS training for other brother companies in the group to help them understand and implement AWS standards;
- Participate in the industry-wide sharing and exchange seminar and share the practice of the site's water reuse system;
- Promote its water reuse system to other brother companies in the group;
- Publicize the concept of sustainable water stewardship on WeChat official account

Score 3

3.9.12 *Advanced Indicator*
A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.  No

Comment The site does not perform this indicator.

3.9.13 *Advanced Indicator*
Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.  No

Comment The site does not perform this indicator.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000517

4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> ✓ Yes
Comment	<p>Lanto's Water Stewardship' specifies the requirements of evaluating site performance and its contribution to achieving water stewardship results based on the objectives of the water stewardship plan. The 2022 water stewardship plan has 13 objectives. Such as Enhance employees' awareness of water conservation; Reduce water consumption per unit of product; Improve wastewater reuse rate and etc.</p> <p>The water stewardship plan states that each objective can be associated with several main outcomes of the standard. Each objective has defined good practices, actions, targets, cost/benefit, desired outcomes, responsible party, partners, start date, end date, status and priority. This design makes it possible to identify the progress of each objective, and as it is updated every year, it is possible to identify its contribution and compare it with the established deadlines.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> ✓ Yes
Comment	<p>The site analysed its value creation resulting from the implementation of water stewardship plan, especially the implementation of water-saving projects.</p> <p>For example, rainwater reuse project, this project may save water 11550 tons/year, and save about 35000 RMB per year.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> ✓ Yes
Comment	<p>1. Provide knowledge sharing to supply chain in and outside the catchment to pay attention to or carry out AWS, enhance their understanding of AWS, and provide support for suppliers in AWS management activities. It impacts over 20 suppliers within the catchment.</p> <p>2. The administrative personnel inspected the rivers in the plant every day, if garbage was found, they will notify the relevant government departments to salvage the garbage. Helping to maintain the clean and neat of the neighbor water environment.</p>
4.1.4	<i>Advanced Indicator</i> <i>A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i> ✗ No
Comment	The facility does not perform this indicator.
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> ✓ Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000517

Comment	The site presents its emergency response procedure and plan identifying proposed preventive and corrective actions, as well as measures to mitigate future incidents. No water-related emergencies and extreme events occurred at the site in recent years.	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	The site performed a satisfaction survey regarding its water stewardship performance in 2022 via internet. The survey results showed that participants are very satisfied with or satisfied with Lanto.	
4.3.2	<i>Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 Yes
Comment	The site performs satisfaction survey to stakeholders to collect their feedback. The site also pay visit to the local government department, so obtained their feedback and suggestion on the AWS performance and future improvement.	
Score	6	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 Yes
Comment	Lanto has developed a 'AWS Management Manual', which specifies that its water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations annually.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000517

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	 Yes
Comment	The site disclosed the site's internal governance in relation to water, communication on sustainable water management issues on its company website: https://www.luxshare-ict.com/Upload/File/201712/%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E6%89%BF%E8%AF%BA%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90.pdf	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	 Yes
Comment	The site disclosed the site's water stewardship in following ways: 1. Satisfaction survey 2. Company website: https://www.luxshare-ict.com/Upload/File/201712/%E5%85%AC%E5%91%8A-2022%E5%B9%B4%E5%BA%A6%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E8%AE%A1%E5%88%92.pdf	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	 Yes
Comment	The site disclosed the water stewardship performance annually, including quantified performance against targets on the company website: https://www.luxshare-ict.com/Upload/File/201712/%E5%85%AC%E5%91%8A-2022%E5%B9%B4%E5%BA%A6%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E8%AE%A1%E5%88%92.pdf	
5.3.2	<i>Advanced Indicator</i> <i>The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>	 No
Comment	The facility does not perform this indicator.	
5.3.3	<i>Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 No
Comment	The facility does not perform this indicator.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>The site disclosed the effort to address shared water challenges in following ways:</p> <ol style="list-style-type: none"> 1. Company website: https://www.luxshare-ict.com/Upload/File/201712/%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E6%89%BF%E8%AF%BA-%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90.pdf 2. The site performed the online stakeholders meeting to share about efforts made by the site to engage stakeholders and coordinate and support public-sector agencies. 	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>Through holding the publicity campaign regarding environmental protection and water saving, the workers' awareness of environmental protection was greatly promoted.</p> <p>The site performed the online supplier meeting to share the AWS.</p> <p>The site performed Satisfaction survey to the stakeholders.</p> <p>The site communicated AWS information on company website: https://www.luxshare-ict.com/Upload/File/201712/%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%B0%B4%E7%AE%A1%E7%90%86%E6%89%BF%E8%AF%BA-%E8%81%94%E6%BB%94%E7%94%B5%E5%AD%90.pdf</p>	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	A procedure to manage non-conformance and related corrective action is developed, there is no water-related compliance violation identified in past few years.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	A procedure to manage non-conformance and related corrective action is developed, there is no compliance violation identified in past few years.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	A procedure to manage non-conformance and related corrective action is developed, any site water-related violation that may pose significant risk and threat to human or ecosystem health is required to immediately communicated to relevant public.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Photographic Evidence from Audit



Purifera water system flow chart.JPG



Wastewater treatment plant.JPG



Factory gate.JPG

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517



Hazardous waste warehouse (1).JPG



Water meter.JPG



Chemical warehouse (2).JPG



CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517

Domestic wastewater discharge point.JPG



Baijiadang Lake.JPG



Rain water discharge point.JPG



Purifera water system.JPG

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000517



Hazardous waste warehouse (2).JPG



Eye washing facility.JPG



Chemical warehouse (1).JPG

✓
Yes