



HSE Compliance Evaluation Report

I. Executive Summary

This report systematically evaluates the compliance of the company's Health, Safety and Environment (HSE) management activities with laws and regulations during the period from January 1 to June 30, 2026. Through document review, on-site inspection, personnel interviews and other methods, it covers core business modules such as material warehousing, equipment maintenance and equipment installation. The evaluation results show that: the overall HSE management compliance rate of the company in the first half of the year reached 95.6% (94.6% for work safety, 95.2% for occupational health, and 97.4% for environmental protection), an increase of 1.8 percentage points compared with the second half of 2024 (93.8%). Core compliance indicators (such as work safety permits and occupational disease hazard declaration) all met the standards; a total of 6 non-compliance items were identified (3 general items and 3 minor items), with no major compliance risks. The main improvement directions focus on "equipment inspection tracking, noise control, and hazardous waste label update", and targeted rectification plans have been formulated to ensure that the compliance rate reaches the 98% target by the end of 2024.

II. Basic Report Information

Item	Content
Report No.	CLADDING-HSE-PD-58
Evaluation Period	January 1, 2025 - June 30, 2025 (Semi-annual)
Evaluation Date	July 1, 2025 - July 10, 2025 (Interim Evaluation)
Organizing Departments	Quality, Safety and Environmental Protection Department (leading) + Warehousing Department (hazardous chemicals management), Equipment Department (special equipment), Installation Department (high-altitude operations), Administration and Logistics Department (occupational health)

Evaluation Purpose	1. Verify the compliance of HSE management activities in the first half of the year with national laws and regulations and industry standards; 2. Identify interim compliance risks (such as expired equipment inspection and excessive noise) and correct deviations in a timely manner; 3. Connect with the annual compliance target and provide a basis for management optimization in the second half of the year
Evaluation Scope	1. Business Modules: Material warehousing (hazardous chemicals / general material stacking), loading and unloading transportation (forklift operations), equipment maintenance (hot work / electrical work), equipment installation (scaffolding / welding); 2. Management Elements: Work safety permits, special equipment inspection, occupational health monitoring, fire-fighting facility maintenance, contractor management, environmental protection (hazardous waste / sewage discharge)
Evaluation Team	Leader: Li Qiang (Manager of Quality, Safety and Environmental Protection Department); Members: Zhang Ming (Safety Specialist), Wang Li (Equipment Engineer), Chen Yong (Occupational Health Manager)

III. Evaluation Basis and Regulation Identification

(I) Evaluation Basis System

Basis Category	Specific Content (Key Updates in the First Half of the Year)
National Laws and Regulations	1. <i>Work Safety Law of the People's Republic of China</i> (Revised in 2021); 2. <i>Occupational Disease Prevention and Control Law of the People's Republic of China</i> (Revised in 2021); 3. <i>Regulations on the Administration of Sewage Permits</i> ; 4. <i>Criteria for Identifying Major Accidents and Hidden Dangers in Industrial and Trade Enterprises</i> (Implemented in May 2023, adding 8 types of major hidden dangers)
Industry Standards and Specifications	1. GB/T 45001-2020 <i>Occupational Health and Safety Management Systems</i> ; 2. GB 50444-2008 <i>Acceptance of Fire Extinguisher Configuration in Buildings</i> ; 3. GBZ 2.1-2019 <i>Occupational Exposure Limits</i> ; 4. SY/T 6276-2014 <i>Health,</i>

	<i>Safety and Environmental Management System for Oil and Gas Industry</i>
Company Internal Systems	1. <i>HSE Management System Manual (2024 Version)</i> ; 2. <i>Provisions on the Inspection and Management of Special Equipment</i> ; 3. <i>Specifications for Storage Labels of Hazardous Wastes</i> ; 4. <i>Special Plan for Noise Control</i>

(II) Updates of Laws and Regulations in the First Half of the Year and Countermeasures

Serial No.	Regulation Name	Update Date	Major Changes (Affecting Business Modules)	Company's Countermeasures (Implemented in the First Half of the Year)
1	<i>Criteria for Identifying Major Accidents and Hidden Dangers in Industrial and Trade Enterprises</i>	May 15, 2023	Added 8 types of major hidden dangers such as "overdue and uninspected special equipment" and "no ventilation in confined space operations" (Equipment Department / Installation Department)	1. Organized training for all employees (covering 120 people); 2. Updated <i>Hidden Danger Investigation List</i> and included "early warning for expired crane inspection" as a key investigation item
2	<i>Catalogue of Hazardous Chemicals (2023 Version)</i>	December 1, 2023	Added 5 types of hazardous chemicals (including "isopropyl alcohol" used by the company's Warehousing Department)	1. Updated <i>Hazardous Chemicals List</i> and MSDS; 2. Added 3 special storage cabinets (explosion-proof type) for isopropyl alcohol

3	<i>Local Measures for the Administration of Noise Pollution Prevention and Control</i>	March 1, 2024	Required industrial site noise to be ≤70dB (A) during daytime (Equipment Department Maintenance Workshop)	1. Completed noise detection at 20 points; 2. Installed sound insulation enclosures at over-standard points (86.5dB (A) in the welding area)
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IV. Evaluation Methods and Implementation Process

(I) Evaluation Methods (Semi-annual Sampling Calibration)

Evaluation Method	Implementation Details (Corresponding to Semi-annual Data)
Document Review	Reviewed 86 HSE records in the first half of the year (32 operation permits, 12 special equipment inspection reports, 42 occupational health physical examination reports) with a sampling ratio of 15% to verify the traces of system implementation
On-site Inspection	Covered 32 operation points (6 hazardous chemical warehouses, 8 maintenance workshops, 10 installation sites, 8 loading and unloading platforms) with a sampling ratio of 20%, focusing on equipment status, fire-fighting facilities and hazardous waste storage
Personnel Interview	Randomly interviewed 45 people (10 managers, 15 front-line operators, 20 contractors) with a sampling ratio of 18% to verify compliance awareness (such as "supervision requirements for hot work")
Data Statistics	Analyzed 68 sets of HSE target completion data in the first half of the year (0 accident rate, 99.2% hidden danger rectification rate, 90% noise compliance rate) and compared them with laws, regulations and the company's semi-annual targets

(II) Evaluation Implementation Process

1. Preparation Phase (July 1 - 3):

- Formulated the *Semi-annual Compliance Evaluation Plan* and clarified the evaluation focus of each business module (such as hazardous waste labels in the Warehousing Department and crane inspection in the Equipment Department);
- Updated the list of laws and regulations and identified the impact of newly added regulations on business in the first half of the year;
- Designed a special inspection form (including semi-annual characteristic indicators such as "special equipment inspection status" and "noise detection results").

1. Implementation Phase (July 4 - 8):

- Document Review: Focused on verifying the *Special Equipment Inspection Ledger* and found that one crane (No. QZ-003) would expire on July 20;
- On-site Inspection: Discovered that the noise in the welding area of the maintenance workshop was 86.5dB (A) (exceeding the standard by 1.5dB (A)), and the labels in the hazardous waste warehouse of the Warehousing Department were not updated (still the 2023 version);
- Personnel Interview: 3 employees in the packaging operation area had insufficient awareness of "correct wearing of dust masks" (compliance rate of 90%).

1. Summary Phase (July 9 - 10):

- Collected non-compliance items and analyzed the root causes (such as "inadequate implementation of equipment inspection plans");
- Formulated rectification measures and clarified the responsible departments and semi-annual closure time limit;
- Compiled the evaluation report and submitted it to the management representative for review.

V. Sub-item Compliance Evaluation Results (Semi-annual Data)

(I) Compliance Evaluation in the Field of Work Safety

Evaluation Item	Applicable Requirements (Laws / Standards)	Compliance Status (☐Compliant ☐Non-compliant)	Semi-annual Evidence Support	Existing Problems (Associated with Business Modules)
Work Safety Permit	Article 2 of <i>Regulations on</i>	☐Compliant ☐Non-compliant	The work safety permit (No.: (Ji) WH An Xu Zheng	-

	<i>Work Safety Permits</i>		Zi [2024]) is within the validity period, and there is no change in the first half of the year	
Special Equipment Management	Article 40 of <i>Special Equipment Safety Law</i> (Regular Inspection)	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	12 special equipment (6 forklifts, 4 cranes, 2 pressure vessels) with an inspection rate of 91.7%, only crane QZ-003 (expiring on July 20) was not inspected	Equipment Department: The crane inspection plan lacks early warning in advance, and there is a risk of expiration
Hazardous Operation Management	GB 30871-2022 <i>Safety Specifications for Special Operations in Hazardous Chemical Enterprises</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	In the first half of the year, 32 hot work permits and 28 high-altitude operation permits were handled, with a complete approval rate of 100% and an on-site supervision in-place rate of 96.9%	Installation Department: The "gas detection time" was not filled in the supervision records of 2 hot work operations, and there is a risk of missed detection
Hidden Danger Investigation and Control	Article 8 of <i>Interim Provisions on the Investigation and Control of Work Safety</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	In the first half of the year, 125 hidden dangers were investigated and 124 were rectified, with a	Quality, Safety and Environmental Protection Department: The "re-inspection responsible

	<i>Accidents and Hidden Dangers</i>		rectification rate of 99.2% and 0 major hidden dangers	person" is not clearly defined in the major hidden danger tracking ledger, and closed-loop management needs to be strengthened
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(II) Compliance Evaluation in the Field of Occupational Health

Evaluation Item	Applicable Requirements (Laws / Standards)	Compliance Status (<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant)	Semi-annual Evidence Support	Existing Problems (Associated with Business Modules)
Occupational Disease Hazard Declaration	Article 5 of <i>Measures for the Declaration of Occupational Disease Hazard Projects</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	Completed the declaration of occupational disease hazards, and no new hazard factors were added in the first half of the year	-
Occupational Disease Hazard Detection	GBZ 2.1-2019 (Noise $\leq 85\text{dB}$ (A), Dust $\leq 8\text{mg}/\text{m}^3$)	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	Detected 20 operation points, 18 of which met the standards. The noise in the welding area of the maintenance workshop was 86.5dB (A), and the dust in the packaging area was 7.2mg/m ³	Equipment Department: The noise reduction measures in the welding area are insufficient, and the aging sound insulation cotton has not been replaced in a timely manner

			(meeting the standard)	
Occupational Health Monitoring	Article 6 of <i>Measures for the Administration of Occupational Health Monitoring</i> (100% physical examination rate for employees exposed to hazards)	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	Organized physical examinations for 120 employees exposed to hazards, with a physical examination rate of 99.2%. Only 1 employee (with hearing impairment) in the maintenance workshop did not re-examine on time	Administration and Logistics Department: The employee re-examination reminder mechanism is missing, and the return receipt of the physical examination report has not been sent
Labor Protection Equipment	Article 14 of <i>Regulations on the Supervision and Administration of Labor Protection Equipment</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	Distributed 800 KN95 dust masks and 500 pairs of anti-noise earplugs, with an allocation rate of 100% and an on-site standard wearing rate of 90%	Warehousing Department: The nose bridge strips of the masks worn by 3 employees in the packaging operation area are not fit, and the frequency of supervision and inspection is insufficient (once a week)

(III) Compliance Evaluation in the Field of Environmental Protection

Evaluation Item	Applicable Requirements (Laws / Standards)	Compliance Status (☐Compliant ☐Non-compliant)	Semi-annual Evidence Support	Existing Problems (Associated with Business Modules)
Sewage Permit	Article 7 of <i>Regulations on the Administration of Sewage Permits</i>	☐Compliant ☐Non-compliant	The sewage permit is valid, and 6 sewage monitoring operations were conducted in the first half of the year, all meeting the standards	-
Hazardous Waste Management	Article 58 of <i>Law on the Prevention and Control of Environmental Pollution by Solid Wastes</i> (Standardized Labeling)	☐Compliant ☐Non-compliant	12 hazardous waste transfer manifests, complete storage ledgers, and reasonable zoning of the hazardous waste warehouse	Warehousing Department: The hazardous waste labels are still the 2023 version, and the "hazardous waste category code" (such as HW49 corresponding to code 083-001-49) has not been updated
Environmental Impact Assessment	Article 24 of <i>Environmental Impact Assessment Law</i>	☐Compliant ☐Non-compliant	The EIA approval of existing projects (Ji Huan Ping [2022]) is valid, and there are no new projects in the first half of the year, so no	-

			additional EIA is required	
Environmental Monitoring	Article 9 of <i>Measures for the Administration of Environmental Monitoring</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	Entrusted a third party to conduct 3 wastewater and 3 waste gas monitoring operations respectively, all data met the standards, and the monitoring reports were archived completely	-

VI. Statistics and Trend Analysis of Compliance Evaluation

(I) Semi-annual Compliance Rate Statistics

Evaluation Field	Number of Evaluation Items	Number of Compliant Items	Number of Non-compliant Items	Compliance Rate (%)	Distribution of Non-compliant Items (Business Departments)
Work Safety	56	53	3	94.6	Equipment Department (1 item: Uninspected crane), Installation Department (2 items: Missing hot work supervision records)

Occupational Health	42	40	2	95.2	Equipment Department (1 item: Excessive noise), Administration and Logistics Department (1 item: Employees not re-examined)
Environmental Protection	38	37	1	97.4	Warehousing Department (1 item: Hazardous waste labels not updated)
Total	136	130	6	95.6	-

(II) Compliance Trend Analysis (Year-on-Year / Month-on-Month)

Evaluation Period	Overall Compliance Rate (%)	Work Safety Compliance Rate (%)	Occupational Health Compliance Rate (%)	Environmental Protection Compliance Rate (%)	Major Progress Areas
Second Half of 2023	93.8	92.1	93.5	96.8	Basic management (operation permit standardization rate increased by 5%)
First Half of 2024	95.6	94.6	95.2	97.4	1. Occupational health: Physical examination

					rate increased by 1.8%; 2. Environmental protection: Hazardous waste transfer compliance rate reached 100% (98% in the second half of 2023)
Increase Range	+1.8	+2.5	+1.7	+0.6	-

VII. Major Non-compliance Items and Root Cause Analysis

(I) List of Non-compliance Items (Focus of the First Half of the Year)

Serial No.	Non-compliance Category	Specific Description (Associated with Business / Regulations)	Risk Level	Violated Regulations / System Clauses	Responsible Department
1	Special Equipment Management	The inspection of crane QZ-003 in the Equipment Department will expire on July 20, and no inspection application has been made in advance, violating the requirement of "regular inspection of	General	Article 40 of <i>Special Equipment Safety Law</i> ; Clause 5.2 of the company's <i>Provisions on the Inspection and Management of Special Equipment</i>	Equipment Department

		special equipment"			
2	Noise Pollution Control	The noise in the welding area of the maintenance workshop is 86.5dB (A) > 85dB (A) specified in GBZ 2.1-2019, and the noise reduction measures (sound insulation cotton) are aging and not replaced	General	Article 22 of <i>Occupational Disease Prevention and Control Law</i> ; Clause 4.3 of the company's <i>Special Plan for Noise Control</i>	Equipment Department
3	Hazardous Waste Label Management	The labels in the hazardous waste warehouse of the Warehousing Department are the 2023 version, and the "hazardous waste category code" and "emergency contact person" have not been updated, violating the "specifications for hazardous waste storage labels"	Minor	Article 58 of <i>Law on the Prevention and Control of Environmental Pollution by Solid Wastes</i> ; Clause 3.1 of the company's <i>Specifications for Storage Labels of Hazardous Wastes</i>	Warehousing Department

4	Occupational Health Monitoring	The Administration and Logistics Department failed to remind 1 employee (with hearing impairment) in the maintenance workshop to re-examine on time, violating the requirement of "tracking of occupational health re-examination"	Minor	Article 35 of <i>Occupational Disease Prevention and Control Law</i> ; Clause 6.4 of the company's <i>Provisions on the Administration of Occupational Health Monitoring</i>	Administration and Logistics Department
5	Hot Work Supervision	The "gas detection time" was not filled in 2 hot work permits of the Installation Department, and there is a risk of missed detection, violating the "safety specifications for hot work"	Minor	Clause 5.2 of GB 30871-2022; Clause 6.3 of the company's <i>Provisions on the Administration of Operation Permits</i>	Installation Department
6	Wearing of Protective Equipment	The masks worn by 3 employees in the packaging operation area of the Warehousing Department are not	Minor	Article 42 of <i>Work Safety Law</i> ; Clause 7.2 of the company's <i>Provisions on the Administration of Labor</i>	Warehousing Department

		standardized (nose bridge strips are not fit), and supervision and inspection are not in place		<i>Protection Equipment</i>	
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(II) Root Cause Analysis

1. Management Level:

- Insufficient closed-loop implementation of systems: For example, the *Provisions on the Inspection and Management of Special Equipment* requires "applying for inspection 30 days before expiration", but the Equipment Department has not established an "automatic early warning ledger" and relies on manual records, leading to omissions;
- Weakened supervision and assessment: Work such as occupational health re-examination and hazardous waste label update is not included in the semi-annual KPI of the department, resulting in insufficient attention from the Administration and Logistics Department and the Warehousing Department.

1. Technical Level:

- Aging of engineering measures: The sound insulation cotton in the welding area of the maintenance workshop has been used for 3 years (design life of 2 years) and has not been replaced in a timely manner, leading to excessive noise;
- Insufficient information support: There is no "compliance risk early warning system", and updates of hazardous waste labels and employee physical examination re-examinations need to be tracked manually, resulting in low efficiency.

1. Personnel Level:

- Unbalanced compliance awareness: Front-line employees (such as those in the packaging operation area) have insufficient mastery of the "standard for wearing protective equipment", and only 1 special training was conducted in the first half of the year;
- Professional competence needs to be improved: The supervisors of hot work in the Installation Department have a poor understanding of the "requirements for filling in gas detection records", and need to strengthen the interpretation of regulations.

VIII. Semi-annual Rectification Measures and Closed-loop Plan

(I) Immediate Rectification Measures (To be Completed by the End of July to Eliminate Interim Risks)

Serial No.	Non-compliance Item	Rectification Measures	Responsible Department	Completion Time	Verification Method
1	Uninspected Crane	1. Immediately apply to the market supervision department for the inspection of crane QZ-003 (scheduled for July 15); 2. Establish an "electronic ledger for special equipment inspection" and set up an automatic early warning 30 days before expiration	Equipment Department	Before the end of July 2025	1. Verify the inspection report; 2. Test the early warning function of the ledger
2	Outdated Hazardous Waste Labels	1. Replace all labels in the hazardous waste warehouse of the Warehousing Department (including the 2024 version of category codes and	Warehousing Department	Before the end of July 2025	1. On-site inspection of label integrity; 2. Verify quarterly verification records

		emergency contact numbers); 2. Compile the <i>Hazardous Waste Label Update Checklist</i> and conduct verification once a quarter			
3	Employees Not Re-examined	1. Contact the employee who did not re-examine and arrange for hearing re-examination before July 25; 2. Establish an "employee physical examination re-examination ledger" and send reminder text messages on the 5th of each month	Administration and Logistics Department	Before the end of July 2025	1. Verify the re-examination report; 2. Spot-check reminder text message records

(II) Medium-term Optimization Measures (To be Completed by the End of September to Connect with Annual Targets)

Serial No.	Improvement Direction	Specific Measures	Responsible Department	Completion Time	Expected Effect
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1	Noise Control	<p>1. Replace the sound insulation cotton in the welding area of the maintenance workshop (select flame-retardant type with a design life of 3 years);</p> <p>2. Add 1 "mobile noise reduction fan" to reduce local noise</p>	Equipment Department, Quality, Safety and Environmental Protection Department	Before the end of September 2025	The noise in the welding area is ≤85dB (A), with a compliance rate of 100%
2	Strengthening Compliance Training	<p>1. Compile the <i>Semi-annual Compliance Training Manual</i> (divided by positions: such as supervisors, warehouse keepers);</p> <p>2. Conduct special training on "hot work specifications" and "wearing of protective equipment" in August, covering all employees</p>	Human Resources Department, Quality, Safety and Environmental Protection Department	Before the end of September 2025	<p>1. The training assessment pass rate is ≥95%;</p> <p>2. The on-site inspection rate of standard wearing of protective equipment is ≥98%</p>
3	Improving Supervision	1. Include "special equipment inspection	Human Resources Department, Quality, Safety	Before the end of	<p>1. Verify the KPI setting document;</p> <p>2. Spot-check</p>

	and Assessment	rate", "occupational health re-examination rate" and "hazardous waste label compliance rate" into the semi-annual KPI of the department, with a weight of 15%; 2. Deduct performance (up to 5,000 yuan) for departments that fail to meet the standards	and Environmental Protection Department	September 2025	performance calculation records
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(III) Long-term Improvement Measures (To be Completed by the End of December to Support the Annual Compliance Target)

Serial No.	Improvement Direction	Specific Measures	Responsible Department	Completion Time	Expected Effect
1	Information System Construction	1. Develop an "HSE Compliance Management System" that integrates modules for "special equipment early warning, hazardous waste	Information Department, Quality, Safety and Environmental Protection Department	Before the end of December 2025	1. The system function coverage rate is 100%; 2. The response time for compliance risk early warning is ≤24 hours

		management and occupational health tracking"; 2. Launch the trial operation in November and officially operate in December			
2	External Compliance Audit	1. Invite a third-party organization to conduct a "semi-annual compliance audit" in October, focusing on verifying noise control and hazardous waste management; 2. Optimize the management process according to the audit report	Quality, Safety and Environmental Protection Department	Before the end of December 2025	1. No major non-compliance items in the audit report; 2. Form 3-5 process optimization suggestions
3	Upgrading of Engineering Measures	1. Install "online dust concentration monitors" in the packaging operation area, which will automatically alarm when exceeding the standard; 2. Complete installation and	Equipment Department, Quality, Safety and Environmental Protection Department	Before the end of December 2025	1. Real-time upload of monitoring data; 2. The over-standard rate of dust concentration is $\leq 1\%$

		commissioning in December			
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IX. Evaluation Conclusions

1. Overall Semi-annual Compliance Situation:

The company's HSE management activities in the first half of 2024 basically comply with national laws and regulations, industry standards and company systems, with an overall compliance rate of 95.6%, an increase of 1.8 percentage points compared with the second half of 2024. There are no major compliance risks in core businesses (such as hazardous chemical storage and sewage permits), laying a foundation for the annual compliance target (98%).

2. Advantageous Areas:

- Timely identification of regulations: All newly added regulations in the first half of the year (such as *Criteria for Identifying Major Accidents and Hidden Dangers in Industrial and Trade Enterprises*) have completed training and system connection;
- Solid basic management: Core indicators such as the standardization rate of operation permits and the occupational health physical examination rate have reached more than 99%, reflecting the effectiveness of the management system.

1. Areas Needing Improvement:

- Insufficient refinement of equipment management: Technical support for special equipment inspection early warning and noise control needs to be strengthened;
- Unbalanced compliance capabilities at the grassroots level: Targeted training for different positions is needed to improve employees' awareness of regulations;
- Information level needs to be improved: System construction is required to achieve "early identification and early rectification" of compliance risks.

1. Suggestions for Work in the Second Half of the Year:

- Focus on promoting the construction of the "HSE Compliance Management System" and complete the launch of core modules by the end of December;
- Conduct a "compliance risk investigation" once a quarter, focusing on weak links such as equipment inspection and hazardous waste management;
- Incorporate compliance training into the mandatory course for new employees to ensure full coverage of compliance awareness among grassroots employees.

X. Attachment List

1. Attachment 1: List of Applicable HSE Laws and Regulations in the First Half of 2025 (Including 114 Items, Marking Updated Items);
2. Attachment 2: Compliance Evaluation Inspection Records (On-site Inspection Forms for 32 Operation Points, 86 Document Review Records);

3. Attachment 3: Semi-annual Non-compliance Report (6 Items, Including On-site Photos and Regulatory Bases);
4. Attachment 4: Semi-annual Rectification Measures Plan for 2024 (Including Immediate / Medium-term / Long-term Measures);
5. Attachment 5: Compliance Trend Analysis Comparison Table (Second Half of 2024 - First Half of 2025).

Retention Period: 3 Years