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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# PRESS METAL INTERNATIONAL LTD

CERTIFICATE  
NUMBER

216

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

PROVISIONAL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

TÜV  
RHEINLAND  
CERT GmbH

DATE OF ISSUE

17 AUGUST 2022

DATE OF EXPIRY

16 AUGUST 2023

CERTIFIED SINCE

17 AUGUST 2022

AUTHORISED BY

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Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

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CERTIFICATION SCOPE

Press Metal International Ltd: whole operation,  
include: Casthouse, Extrusion, Anodizing, Powder  
Coating, PVDF and fabricated extrusion profile.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Press Metal
ENTITY NAME	Press Metal International Ltd
CERTIFICATION SCOPE	The whole operation of Press Metal International Ltd (China), including: Casthouse, Extrusion, Anodizing, Powder Coating, PVDF and fabricated extrusion profile.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Other manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>25 – 28 April 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>23 June 2022</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit</u></p> <p>The audit scope covers the design and manufacturing of Architectural and Industrial Aluminium Alloy Profiles (Anodized Oxide Profiles, Electrophoretic Painting Profiles, Powder Spraying Profiles, Fluorocarbon Spraying Profiles, Anti-thermal Profiles).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Other manufacturing or sale of products containing Aluminium</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>

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AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Provisional Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li>☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	17 August 2022 – 16 August 2023
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	16 February 2023
CERTIFICATE NUMBER	216

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established procedures to collect the Applicable Law/regulation which cover labour, ethics, health and safety and environment. The Human Resources, Administration and Environment, Health and Safety Departments are responsible for the collection and assessment at least once per quarter.</p> <p>Two qualified law officers and the Legal Department ensure the Entity operates according to Applicable Law.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established a Business Ethics Policy/procedure, which covers Anti-Extortion and Bribery, and training is provided to employees. The ethics reporting channel is available on the Entity's website:  <a href="http://www.pressmetal.com.cn/list/32.html">http://www.pressmetal.com.cn/list/32.html</a></p> <p>The Due Diligence investigation has included the high-risk positions within the Entity, such as the Purchasing, Sales, and Finance Departments. Employees in these Departments have signed the Honesty Commitment Letter.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct and has provided training to Workers. The Code of Conduct has been communicated to suppliers and suppliers have signed the relevant Commitment Letters. The Code is included in the 2021 Sustainable Development Report:  <a href="http://www.pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://www.pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established a Management System that includes a Policy on environmental, social and governance compliance:  <a href="https://www.pressmetal.com/esg/#governance-policies">https://www.pressmetal.com/esg/#governance-policies</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Commitment to implement the ASI Management System is established by the senior management team. The effectiveness of the system is reviewed during the annual management review.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Policies are available for internal stakeholders via training. External stakeholders can access the Policies on the Entity's website:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.pressmetal.com/esg/#governance-policies">https://www.pressmetal.com/esg/#governance-policies</a>
2.2 Leadership	Conformance	<p>The Environment, Health and Safety (EHS) Manager has been appointed as the Management Representative to ensure the social, environmental and governance requirements are reflected in the Entity. The authorities and responsibilities of the role are defined in the appointment letter. An ASI team has been established to support the implementation of the ASI Management System.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>An Environmental Management System has been established and implemented. The Entity has obtained ISO 14001:2015 certification:  <a href="http://cx.cnca.cn/CertECloud/result/skipDetail?rzjglid=CNCA-RF-2002-05&amp;certNumber=01104060460&amp;showtemp=1&amp;etlid=&amp;geetest_challenge=87df302b2a529c6c2ae2b91317c0cec9&amp;geetest_validate=60f03aa61eeb7bf71f80ae2a7e2cf832&amp;geetest_seccode=60f03aa61eeb7bf71f80ae2a7e2cf832%7Cjordan">http://cx.cnca.cn/CertECloud/result/skipDetail?rzjglid=CNCA-RF-2002-05&amp;certNumber=01104060460&amp;showtemp=1&amp;etlid=&amp;geetest_challenge=87df302b2a529c6c2ae2b91317c0cec9&amp;geetest_validate=60f03aa61eeb7bf71f80ae2a7e2cf832&amp;geetest_seccode=60f03aa61eeb7bf71f80ae2a7e2cf832%7Cjordan</a></p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established the ASI Management System, which covers the social management system. Internal audits and management reviews are conducted annually to ensure the effectiveness of the Management System. For the non-conformance, the Entity has conducted root cause analysis and implemented corrective and preventive action.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity is committed to responsible sourcing and has conducted supplier assessments and required suppliers sign a commitment letter. The Policy is available on the website:  <a href="https://www.pressmetal.com/esg/#governance-policies">https://www.pressmetal.com/esg/#governance-policies</a></p>
2.5 Impact Assessments	Major Non-Conformance	<p>The Entity conducted a Social Accountability Risk Assessment covering a gender analysis and the impacts of social, cultural and Human Rights aspects in March 2022, and no high risks were identified. The Entity's ASI System Manual defines the requirement for impacts assessment to be conducted for all New Projects and Major Changes to the existing facilities. The environmental impact analysis is covered by the ISO14001 Management System which is certified by qualified third party. The Entity has developed an Environment Impact Assessment (EIA) report and received approval for a technical improvement project.</p>

CRITERION	RATING	COMMENT
		However, the Entity has not updated the Pollution Discharge Permit (PDP) and has not completed the Environment Protection Check Approval (EPCA) process for the new facilities according to legal requirements.
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected Stakeholder groups, the Emergency Response Plans have been established and implemented and training on the plans is provided periodically.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger or acquisition control procedure, including the Due Diligence process. In the past three years, there has been no merger or acquisition in the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closure, decommissioning and divestment control procedure in accordance to the requirement of the ASI Performance Standard. There has been no such case since the ASI Management System became operational or in the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published the Sustainable Development Report on the website: <a href="http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf">http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf</a> The Press Metal group, which includes the Entity, has published an Annual Report on the website: <a href="https://www.pressmetal.com/investor-relations/reports-presentations.php">https://www.pressmetal.com/investor-relations/reports-presentations.php</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has provided information on non-compliance and liabilities on the website: <a href="https://www.qcc.com/csusong/2140b2b9073786a14e051f4a8c0fe300.html">https://www.qcc.com/csusong/2140b2b9073786a14e051f4a8c0fe300.html</a> In the past three years, there have been no fines or issues of non-compliance.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to requirements on anti-corruption. The Entity's 2021 financial audit report issued by a qualified third party, indicates all payments to the government are based on the legal law or contracts. The Entity has disclosed the payments to governments in the Sustainable Development Report: <a href="http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf">http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf</a>

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from stakeholders and has an appropriate Complaints Resolution Mechanism. The communication channels (telephone) are public to internal and external stakeholders, and included in the Sustainable Development Report: <a href="http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf">http://www.pressmetal.com.cn/upload/ueditor/20220511/202205111430299509.pdf</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has conducted Life Cycle Assessment (LCA) for its three main products, with LCA reports prepared in March 2022. However, the assessment only covers the environment impacts from gate to gate and the impacts from the supply chain are not considered, and the assessment data does not cover wastewater and solid waste generated by processes.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented policies and processes for LCA. LCA information is provided upon request. The request channel is included in the Sustainable Development Report: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented policies and processes for LCA. LCA information will be provided upon request and the Entity will ensure communication of LCA information is adequate and accurate according to ASI requirements. The request channel is included in the Sustainable Development Report: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a>
4.2 Product design	Minor Non-Conformance	The Entity has established procedures for Life Cycle Assessment (LCA) in the product design process to consider environment impacts including energy consumption, water, air emissions and waste. In the design phase all the environment factors of LCA have been identified and listed in the final

CRITERION	RATING	COMMENT
		design reports, however, no quantifiable data for each factor is determined and no continual improvement objective has been established.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and improvement programs for each process to reduce scrap during production. 100% of Aluminium Process Scrap is recycled by the internal re-melting workshop. The scrap generation rate is reviewed at monthly management meetings to ensure targets are met.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has adequate and effective procedures to classify and dispose the different kinds of Aluminium scrap. All scrap is classified for alloy separation and recycled at different smelters.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	The Entity has established a strategy for the collection and recycling of Aluminium products at End of Life. The collection and recycling data are maintained by the materials system. However, the Entity's strategy does not include clear targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	The Entity has system and process to improve the reuse rate of aluminium. At present, the Entity has signed recycling contracts with customers and recycle companies to collect the scrap of products at End of Life, and related recycling records are maintained. However, the Entity does not monitor the recycled Aluminium rate in the products and there is no detailed program to improve the reuse rate of Aluminium for products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published Greenhouse Gas (GHG) emissions data in the Sustainable Development Report, page 16-17: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a> The GHG emissions calculations are determined internally, and the GHG source inventory and raw data are provided for verification by a third party. In 2021, a total 73,430.54 tonnes CO <sub>2</sub> was emitted from internal activities.
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has established a GHG emissions reduction target of 2% for 2021 against 2020 data, and has implemented improvement programs to achieve the target. The Entity's major GHG



CRITERION	RATING	COMMENT
		generation sources are electricity and natural gas with the source of electricity being 81% coal-fired and 19% solar power. The management team reviews progress against the target annually. However, the Entity did not meet its reduction target in 2021 and has not developed the root cause analysis nor implemented corrective actions.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	<p>The Entity has established an air emissions inventory for all air emission sources and a qualified third party monitors all the outlets according to the monitoring plan. The Entity has established continuous reduction targets for major indexes such as sulphur dioxide, oxynitride and Volatile Organic Compounds (VOCs) and the targets are tracked and reviewed by management team annually. The Entity has implemented improvement programs to reduce air emissions. Air emissions data is included in the annual Sustainable Development Report: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a></p> <p>However, two isolated non-conformances have been identified, including (1) Fugitive emission monitoring of VOCs does not cover points within the boundary; (2) Dust and fumes, which are mandatory controlled indexes according to the permit, are not monitored at three outlets.</p>
6.2 Discharges to Water	Minor Non-Conformance	The Entity has established a wastewater inventory to control Discharges to Water. Industrial wastewater is collected and treated at the Entity's parent company owned wastewater treatment plant (WWTP) prior to discharge to the local municipality WWTP. The Entity has monitored the wastewater on a quarterly basis and results are within the limits. The Entity has established a reduction plan for wastewater discharge and the improvement programs are monitored.

CRITERION	RATING	COMMENT
		<p>Wastewater management information is included in the annual Sustainable Development Report: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a></p> <p>However, two isolated non-conformances have been identified, including (1) The Entity does not monitor the Biochemical Oxygen Demand (BOD) and Animal and Plant Oil (APO) of domestic wastewater as required; (2) The Entity has not monitored the underwater test as required.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted annual Spills and Leakage assessments. There are no high risks identified and the Entity has implemented preventive actions and improvement programs for all potential risks.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted annual Spills and Leakage assessments. There are no high risks identified and the Entity has implemented preventive actions and improvement programs for all potential risks. Emergency response programs are established and registered with the local Environment Bureau.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established an environment protection procedure that covers management and reporting of Spills.
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity had a minor Spill incident in the past year with the facility having dealt with the spill in accordance with its emergency response process. The incident is disclosed in the Sustainable Development Report:</p> <p><a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a></p>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has defined a solid waste management procedure to cover the collection and disposal of all waste. Hazardous Waste is transferred to qualified third parties according to legal requirements and an inventory and disposal receipts are kept. The Entity has established continual improvement targets to reduce waste generation and targets are reviewed annually by the senior management team.
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has incorporated the waste management information into the Sustainable Development Report:</p> <p><a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a></p>

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity complies with the Recycled Materials Management Regulation which defines an adequate and effective process to collect and recycle Aluminium from Dross. Prior to being sent to specialised vendors, the Entity recycles approximately 70% of Dross internally.
6.8b Dross (recycling)	Conformance	Dross is recycled and refined by internal smelters. It is used as a material rather than as waste and the component of Dross that cannot be recycled internally is sold to qualified vendors for use in building materials.
6.8c Dross (review of alternatives)	Conformance	The Entity has reviewed Dross recycling management monthly. Dross is reused internally or recycled externally for use in building materials. There is no landfilling of Dross residues.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has assessed the water consumption via a qualified third party during the environment impact assessment associated with the Facilities founding, which indicated the water source is compliant with legal requirements and approved by the local bureau. The Entity has established water mapping and regularly reviews the updates and changes. A water risk assessment is conducted annually, and no high risks are identified.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted an annual water risk assessment, the latest assessment conducted in March 2022, which fully covers the Entity's Area of Influence, and no high risks are identified.
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce the water consumption and has established programs to achieve the targets.
7.2b Water management (monitoring)	Conformance	The Entity has annual targets to continually reduce the water consumption and has established programs to achieve the targets. The targets and progress of programs are reviewed monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed the water usage and risks in the annual Sustainable Development Report: <a href="http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf">http://pressmetal.com.cn/upload/ueditor/20220428/202204281312216201.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity's Biodiversity assessment is included in the Environment Impact Assessment (EIA) reports, which were prepared by a qualified third party and identified no negative impacts on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Entity's Biodiversity assessment determined there were no negative impacts on biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the Entity's Biodiversity assessment determined there were no negative impacts on biodiversity.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Entity's Biodiversity assessment determined there were no negative impacts on biodiversity.
8.3 Alien Species	Conformance	The Entity has annually assessed the Alien Species and no material risk has been identified.

CRITERION	RATING	COMMENT
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established its Policy and procedure for compliance with Human Rights in the ASI Management Manual. The policy is available on the website: <a href="https://www.pressmetal.com/esg/#governance-policies">https://www.pressmetal.com/esg/#governance-policies</a> The Entity has identified Human Rights risks and provides relevant training for all employees.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has established a procedure to conduct the Human Rights Due Diligence. The Entity conducts Human Rights Due Diligence for Communities and some suppliers/contractors according to the procedure. However, the procedure is not implemented effectively and, at the time of the audit, the Human Rights Due Diligence had not covered internal aspects nor all suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to stakeholders: <a href="http://www.pressmetal.com.cn/list/32.html">http://www.pressmetal.com.cn/list/32.html</a> There have been no adverse impacts reported, therefore no remedy is needed.
9.2 Women’s Rights	Conformance	Women’s rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met, such as providing sufficient protection to pregnant workers and nursing mothers. Around 50% of the management staff are female. The female workers are treated same as male workers, with equal pay, access to training and promotion.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the areas where the Entity operates.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	The Entity's Environmental Impact Assessment (EIA) process determined that cultural and sacred heritage sites and values are not affected.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity's Environmental Impact Assessment (EIA) report determined that Resettlement was not necessary.
9.6b Resettlements (where unavoidable)	Conformance	The Entity's Environmental Impact Assessment (EIA) report determined that Resettlement was not necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established the ASI management manual, which includes the procedure that the Entity respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity is located within an industrial park and the nearest Community is approximately 1.5km away. Some of its employees are from the local area. The Entity has installed environmental protection devices to reduce the impact of air emissions and boundary noise on the Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs some Workers from the Local Communities. The Entity has established plans to support the surrounding communities, such as providing job opportunities and donating to the local communities and environmental protection organizations.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established the ASI management manual, which includes the procedure that the Entity commits to not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity's internal Due Diligence investigation reports and the signed supplier commitments, have identified that no materials are from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	Security at the Entity is provided by a qualified third party. The Entity has implemented the Security Code of Conduct to respect Human Rights. All security staff are trained on the policy

CRITERION	RATING	COMMENT
		and procedure, which includes anti-harassment, anti-abuse and anti-forced labour.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits to respect the Workers' rights. There are 22 elected Worker representatives in the Association for Workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of Workers to Collective Bargaining, and to participate in any Collective Bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives deal with Workers' concerns with management on behalf of the Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use Child Labour (under 16 years) or young Workers (between 16 to 18 years).
10.2b Child Labour (hazardous)	Conformance	The Entity does not use Child Labour or young Workers (between 16 to 18 years). If young Workers are used, they are under special protection and are not allowed to work in hazardous working environments.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use Child Labour or young Workers. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI management manual and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. The Entity does not use Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. All employees are employed directly, and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. There are no foreign Migrant Workers at the Entity, all workers are Chinese.

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. There is no restriction of Workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The Entity does not hold any original documents, passports or permits, only copies are retained in the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The time for announced termination of the working contract is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has established a procedure on anti-Discrimination which includes processes for hiring, salary, promotion and. The Entity provides equal pay for Workers with a disability.
10.5 Communication and engagement	Conformance	The Entity undertakes direct and frequent communication with Workers and the Worker representatives on the Worker's councils. A positive working environment and direct communication was noted by interviewed Workers. The Entity conducts a monthly satisfaction survey to collect Workers' feedback.
10.6 Disciplinary practices	Conformance	In accordance with the Entity's ASI management manual, the Entity does not tolerate any form of punishment and harassment. It requires its suppliers to comply with relevant policies and procedures. Disciplinary measures are regulated by law and require written evidence and the involvement of the Worker representative. Workers are trained and communicated on the disciplinary control procedure. All disciplinary records are confirmed by both Workers and management.
10.7a Remuneration (living wage)	Conformance	The Entity's wages are in compliance with legal standard, and meets the basic needs of Workers. All the employees are enrolled in the social insurance and housing funds.



CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	In accordance with payroll records, wage payments are documented and paid to Workers on 15th of each month directly into the employees' bank accounts There has been no delayed payments over the past 12 months.
10.8 Working Time	Major Non-Conformance	The Entity has established and implemented a procedure to provide paid annual leave, sick leave, marriage leave and maternity leave to Workers. Working hours are recorded and monitored. Most Workers have 1 day off in every 7 days. However, in an isolated case, a worker did not have day off and his weekly working exceeded 60 hours, and 20 out of 90 sampled Workers' monthly Overtime hours exceeded the legal limit of 36 hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a valid ISO 45001:2018 certification (3 January 2020 - 2 January 2023) covering the whole Certification Scope. The Entity has established formal policies for Occupational Health and Safety and has posted the Policy in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has adequate and effective policies and procedures to ensure all Workers and Visitors follow internal Occupational Health and Safety requirements, including orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has established formal policies for Occupational Health and Safety including legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has established formal policies for Occupational Health and Safety including the right to stop unsafe work and providing a safe working environment.
11.2 OH&S Management System	Conformance	The Entity has a valid ISO 45001:2018 certification (3 January 2020 - 2 January 2023) covering the whole Certification Scope. The latest audit, conducted in December 2021 did not find any non-conformances. The audit observations related to risk control and the Entity has taken adequate and effective preventive actions for these observations.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has adequate and effective mechanisms to collect Workers' feedback on Occupational Health and Safety. The mechanisms include suggestion boxes, worker representative meetings, irregular worker interviews and accident/injury analysis.
11.4 OH&S performance	Conformance	The Entity has established targets and control programs for accident/injury/fire on Occupational Health and Safety. The Entity's management has reviewed the programs and targets on a monthly basis.

**Document Control and Version History**

Revision	Date	Notes
0	17 August 2022	Initial Certification Audit – Provisional Certification