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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**SHANGQIU  
YANGGUANG  
ALUMINIUM  
PRODUCT CO., LTD**

CERTIFICATE  
NUMBER

113

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

18 JANUARY 2021

DATE OF EXPIRY

17 JANUARY 2024

CERTIFIED SINCE

18 JANUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a light green background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*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

Production and Sales Service of Aluminium and  
Aluminium Alloy Plate, Sheet, Strip and Related  
Management Activities (China).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Shangqiu Yangguang Aluminium Product Co., Ltd.
ENTITY NAME	Shangqiu Yangguang Aluminium Product Co., Ltd.
CERTIFICATION SCOPE	Production and Sales Service of Aluminium and Aluminium Alloy Plate, Sheet, Strip and Related Management Activities (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Material Conversion (Production and Transformation)</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 (19 – 20 October 2020)</li><li>• Surveillance Audit (20 – 21 June 2022)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 19 – 20 October 2020 (Initial Certification Audit)</li><li>• 20 – 21 June 2022 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 22 December 2020 (Initial Certification Audit)</li><li>• 13 July 2022 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (19 – 20 October 2020)</u></p> <p>Shangqiu Yangguang Aluminium Product Co., Ltd. is located at No. 1, Xinfeng Road, LiZhuang Town, Liangyuan District, Shangqiu City, Henan Province, China. The main products include Aluminium and Aluminium Alloy Plate, Sheet and Strip. The main production processes include casting, cold rolling, annealing and packing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Casthouses</li><li>• Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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Surveillance Audit (20 – 21 June 2022)

The audit scope covers the main products including Aluminium and Aluminium Alloy Plate, Sheet and Strip. The main production processes include casting, cold rolling, annealing and packing.

Supply chain activities included in the Audit Scope:

- Casthouses
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION  
PERIOD

18 January 2021 – 17 January 2024

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

17 January 2024

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CERTIFICATE  
NUMBER

113

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes to maintain awareness of and ensure compliance with Applicable Law. The Entity has valid ISO 14001:2015 and ISO 45001:2018 certificates.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are developed and implemented, including the Procedure on Anti-Corruption. Personnel are trained in these processes and training records are maintained. The Entity has a Policy for Labour and Business Ethics: <a href="https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ">https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance: <a href="https://mp.weixin.qq.com/s/6yiuYOIE5G3UzamVZ2GwbQ">https://mp.weixin.qq.com/s/6yiuYOIE5G3UzamVZ2GwbQ</a> The Entity implemented adequate measures, including training, communication to raise awareness of the Code among business partners and suppliers.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established and implemented Policies on the environmental, social and governance practices included in the ASI Performance Standard: <a href="https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ">https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ</a> The Policies are consistent with the Entity's environmental, social, and governance practices.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrate commitment to the implemented Policies. Policies and Procedures are reviewed and updated on a regular basis, e.g., the annual management review meeting. The Entity holds valid ISO 9001, ISO 14001 and ISO 45001 certificates.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external Stakeholders by training, post on-site and the website: <a href="https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ">https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ</a>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Social Management System and holds a valid ISO 45001:2018 certificate. The main social and Occupational Health and Safety impacts are identified and assessed and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Due Diligence audits at major next tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements.
2.5 Impact Assessments	Conformance	The Entity has implemented Procedures and systems to conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes to existing facilities. The Entity demonstrates a proactive and inclusive approach with key Stakeholders both internally and externally for Major Changes and projects. An Impact Assessment covering social and environmental issues for the New Project currently under construction, was conducted.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans are developed and implemented. Personnel are trained in emergency response and records of drills are maintained.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Procedure for mergers and acquisitions, however, no such activity has occurred since the commencement of operations in 2008.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment, however, no such event has occurred since the commencement of operations in 2008.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social and economic impacts in the 2021 Sustainability Report: <a href="https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw">https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw</a> The report is not verified by a third party.
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in the 2021 Sustainability Report: <a href="https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw">https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw</a> There were no significant fines or penalties imposed on the Entity as reported in the Sustainability Report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in the annual Financial Audit Report.
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	An internal and external whistleblowing/ complaints/ grievance mechanism exists (e.g. whistleblower hotlines, email address, suggestion box).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted and documented an environmental Life Cycle Assessment (LCA) which covers all products. The LCA addresses a cradle-to-gate approach, with the impact of the various production stages and End of Life recycling assessed. The assessment is not consistent with ISO standard. The LCA Report is available: <a href="https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ">https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its aluminium products covering all production processes and main supporting activities, such as transportation, rolling oil recycling and waste disposal. The LCA Report can be provided if required.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Life Cycle Assessment (LCA) Report is available at:  <a href="https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ">https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ</a></p> <p>The Entity has defined an information disclosure procedure which includes communication with customers.</p>
4.2 Product design	Conformance	<p>The Entity has established targets for energy consumption and GHG Emissions per product. The Entity has integrated relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product.</p> <p>There has been no new product developed in the past 12 months. The Entity has established targets for product yield and electricity consumption. The achievement of the targets is reviewed every month.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has implemented a waste/scrap management Procedure and established a target for Aluminium Process Scrap to be 100% recycled. The Entity collects all process scrap generated in its operation, recycles it as raw material in the melting process and records the amount in daily summary reports. Information on process scrap is included in the Life Cycle Assessment (LCA) Report, Section 2.1:  <a href="https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ">https://mp.weixin.qq.com/s/sLUiC8F5L0THLYSwoTXeWQ</a></p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Product content control is a requirement of the Entity's Quality Management System. Aluminium Process Scrap is identified with a unique batch number for traceability and alloy separation. The Entity has implemented its procedure to separate Aluminium alloys and grades for recycling.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has a five-year waste recycling strategy to collect and recycle the products at End of Life. The Entity is investing to build the capacity for post-customer waste recycling.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>In the absence of a local, regional or national collection and recycling systems for aluminium scrap in China, the Entity does not collect and recycle the products at End of Life currently. The Entity is investing to build the capacity for post-customer waste recycling.</p>

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has implemented a procedure for Greenhouse (GHG) Emissions and tracks, calculates and documents its major Scope 1 and 2 GHG Emissions and energy use by source. Energy consumption is monitored and documented as one of the main GHG Emission sources. The GHG Emissions Report is available: <a href="https://mp.weixin.qq.com/s/DKUIsl3JS6qwXALomnnZxg">https://mp.weixin.qq.com/s/DKUIsl3JS6qwXALomnnZxg</a> Energy consumption and other major GHG sources are converted using the GHG protocol defined by the Entity; the 2021 GHG Emissions Report is not verified by a Third Party.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target for 2022 to reduce GHG Emissions per tonne of product by 5% compared with 2021 levels. The implementation plan for the reduction target has been established. The targets and implementation plan are published: <a href="https://mp.weixin.qq.com/s/Awer3qs5lp_yaYJfBMxmyw">https://mp.weixin.qq.com/s/Awer3qs5lp_yaYJfBMxmyw</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Pollutants in the Entity's air emissions are quantified in the Environmental Impact Assessment report and the pollutant discharge permit. The treatment facilities are built and used. Emissions to Air are monitored quarterly and emissions are within the local legal emissions limit.
6.2 Discharges to Water	Conformance	The Entity does not generate wastewater in the production process, only sanitary wastewater is discharged after treatment. The discharge status is monitored quarterly. Wastewater monitoring reports in 2021 and 2022 indicate major pollutants were monitored and discharges were within local legal discharge limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted a risk assessment for Spills and Leakage which may contaminate air, water and soil by its operation and in its Area of Influence,



CRITERION	RATING	COMMENT
		following the risk assessment process outlined in the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The assessment and management of Spills and Leakage is defined in the Entity's Environmental Management System. Major Spills and Leakages are handled and communicated by the emergency response team. Relevant training is provided to Workers.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills and Leakages is defined in the management procedure on information disclosure. There has been no Spills or Leakages at the Entity since the commencement of operations.
6.4b Reporting of Spills (regular reporting)	Conformance	The Impact Assessments of Spills and Leakages and the remediation actions taken are published in the Entity's annual Sustainability Report. There has been no Spills or Leakages at the Entity since the commencement of operations, as reported in the Sustainability Report, in Section 3.9: <a href="https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw">https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw</a>
6.5a Waste management and reporting (strategy)	Conformance	Waste management is a part of the Entity's Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is in compliance with legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed its waste generation and disposal information in the Sustainability Report, Section 3.8: <a href="https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw">https://mp.weixin.qq.com/s/Kt8EAKHjAMv6lrZzjRPRFw</a>
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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 has implemented a waste management procedure which addresses the collection of Dross and Dross residues. Dross, in part, is recycled during the melting process. Dross residues are transferred to an external, qualified company for disposal.
6.8b Dross (recycling)	Conformance	Dross, in part, is recycled during the melting process. Dross residues are transferred to an external, qualified company for disposal. Dross residues are classified as a Hazardous Waste.
6.8c Dross (review of alternatives)	Conformance	Dross residues are classified as a Hazardous Waste and are transferred to a processor licensed by the Environmental Protection Agency. Landfilling of Dross is prohibited by the government.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water source is underground water and usage is tracked and documented in accordance with its Permit of Water Withdrawal. The Entity has conducted a water-related risk analysis including water balance to identify and map its water withdrawal and use by source and type. The water balance map is available: <a href="https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ">https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ</a>
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment which addressed the Entity's operational, internal and external risks within their Area of Influence: <a href="https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ">https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ</a>

CRITERION	RATING	COMMENT
		Due to the nature of the product, production processes and the withdrawal volume, the Entity's water-related risk is considered low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Entity has implemented its information disclosure management procedure. The Entity has disclosed its water usage and risks in the Water Risk Assessment Report: <a href="https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ">https://mp.weixin.qq.com/s/-ie-i8zoogvcLhwS3V9ZFQ</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a mandatory Environmental Impact Assessment (EIA) which addressed a Biodiversity assessment. The risk of impact on Biodiversity from the operation of the Entity and within its Area of Influence was assessed as low. The assessment involved qualified Third Parties and the report was approved by the local Environmental Protection Bureau. Based on EIA report, the Entity compiled the ASI Biodiversity Risk Assessment Report: <a href="https://mp.weixin.qq.com/s/utiXZSBt-RYVoOG03Fq8iw">https://mp.weixin.qq.com/s/utiXZSBt-RYVoOG03Fq8iw</a>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Conformance	The outcome of the biodiversity risk assessment did not identify significant biodiversity impacts. The ASI Biodiversity Risk Assessment Report is available: <a href="https://mp.weixin.qq.com/s/utiXZSBt-RYVoOG03Fq8iw">https://mp.weixin.qq.com/s/utiXZSBt-RYVoOG03Fq8iw</a>
8.3 Alien Species	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts including Alien Species.

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 implemented a Human Rights Policy: <a href="https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ">https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ</a> The Policy commitment to respect Human Rights is established and communicated to all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and has established and implemented a Human Rights Due Diligence process. The impacts on Human Rights have been identified, assessed and mitigation and control measures established and implemented, such as audits on major suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted a risk assessment that identified the major risks are in the supply chain. The Entity has established and implemented management procedures for suppliers and on-site contractors. On-site audits are performed on the major suppliers to assess and control the risks and negative impacts. There have been no adverse cases reported in the supplier audits. The Entity has established a complaints/grievance channel and Stakeholders, including Workers, can use a suggestion box, public email, or hotline to report a grievance or concern. The Worker representatives can report on behalf of Workers. There are no reported issues on Human Rights associated with the Entity and its major suppliers.
9.2 Women’s Rights	Conformance	The Entity has a Code of Conduct which commits to equality between genders and is working to raise the share of women in the workforce: <a href="https://mp.weixin.qq.com/s/6yiuYOiE5G3UzamVZ2GwbQ">https://mp.weixin.qq.com/s/6yiuYOiE5G3UzamVZ2GwbQ</a> The Entity implements Policies and processes to ensure respect for the rights and interests of women,

CRITERION	RATING	COMMENT
		consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). Women's legal rights and interests are respected. There have been no complaints received by women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented its policy with a commitment to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity has conducted a risk assessment which addresses Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has identified and assessed the impact on the Local Communities. Control measures for the identified impact on Local Communities have been established and implemented. There has been no complaint received by the Local Communities. The Entity participates in the local government initiative to help vulnerable people in the Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests. The Entity is active in community engagement.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has made a commitment to not use conflict minerals and has communicate this through the aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a

CRITERION	RATING	COMMENT
		commitment letter to not use conflict minerals. There have been no complaints received on this issue.
9.9 Security practice	Conformance	Security guards are hired directly by the Entity. The Entity has implemented policies and procedures addressing their commitment and approach to security activities that respect Human Rights, such as not permitting body searches. Training is provided to ensure all security Workers understand their responsibilities and how to demonstrate respect of Human Rights. There have been no grievances or complaints received on the Entity's security activities.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the Workers right to Freedom of Association and to Collective Bargaining. The Entity has six elected trade union committee members, including one woman and 49 Worker representatives including nine women, all freely elected by Workers.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity respects the rights of Workers to Freedom of Association and Collective Bargaining, participates in collective bargaining processes in good faith to the extent possible under Applicable Law and adheres to Collective Bargaining Agreements. There is a Collective Bargaining Agreement between the Entity and Trade Union and all terms in the Agreement meet or are beyond the local legal requirements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity respects the rights of Workers to Freedom of Association and Collective Bargaining. The Trade Union can address the Workers' concerns with management on behalf of the Workers. Workers are aware of the process to make a complaint or report concerns.
10.2a Child Labour (minimum age)	Conformance	There is no Child Labour or young Workers at the Entity. The youngest Worker, born in 2002, joined the Entity in 2022.
10.2b Child Labour (hazardous)	Conformance	There is no Child Labour or young Workers at the Entity. The Entity has established a management procedure for the protection the young Workers (16 to 18 years) that is in compliance with the local legal requirements and does not allow young Workers to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China and there is no Child Labour or young Workers at the Entity. The Entity commits itself - and expects its suppliers to

CRITERION	RATING	COMMENT
		comply with the prohibition of Child Labour. The Entity communicates the requirement to the Workers and its suppliers.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity commits itself - and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. The Entity communicates the requirement to Workers and its suppliers. There have been no cases of Human Trafficking reported.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. As verified by Worker and management interviews and review of payroll information, employees are not required to provide any form of deposit; Recruitment Fee or equipment advance at any stage during employment.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers at the Entity. All workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide any form of loan to Workers. There are no Debt Bondage terms in labour contracts signed between the Entity and Workers. The payslips of Workers do not indicate any illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' freedom of movement at the site. Workers are free to leave the factory when not engaged in work; and move freely as needed during working hours to access basic amenities, such as toilet facilities and drinking water. Workers can access external medical facilities as required.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of original documents of workers, only copies of original documents are kept in workers' personal files.
10.3g Forced Labour (freedom to terminate employment)	Minor Non-Conformance	The Entity is not involved in Forced Labour. The signed labour contracts do not contain language to limit the Workers' ability to voluntarily terminate their employment. Workers know their rights to terminate their employment without penalty and the required notice time for terminating the employment is in compliance with the Labour Contract Law. Resigned Workers receive wages without delay. However, some mandatory items were missing in the signed labour contract of one of the 80 sampled contracts.



CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. There has been no case of Discrimination received. Recruitment advertisements and the training plan indicates that decisions are made solely based on a candidate's or Worker's ability to perform the job's requirements rather than other personal characteristics. Interviewed Workers confirm there is equal opportunity at the Entity.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication with Workers and the Worker representatives. The communication channels are announced to Workers and Workers may raise concerns regarding working conditions, labour rights and OH&S issues and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are in compliance with legal requirements and require the confirmation of involved Worker. The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity has established a written procedure that prohibits any forms of sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation. Disciplinary measures are approved at trade union meetings.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined and the basic wage meets the legal minimum wage. The total payment meets the Workers' basic needs and remuneration is paid to Workers without delay.
10.7b Remuneration (method of payment)	Conformance	Wages payments are documented and timely paid to all Workers by bank transfer on the 30 <sup>th</sup> of the following month. Detailed information on wages, allowances, Overtime compensation and deductions is provided on payslips.
10.8 Working Time	Conformance	Working hours are recorded by a finger-scanning meter. The regular working time is 40 hours a week, five days a week. Office staff and daily shift Workers have only one shift. Working hours are monitored and monthly Overtime working hours do not exceed the legal monthly limit and at least one day off per week is guaranteed. Workshop Workers follow a comprehensive working hours system with four groups for three shifts and work for six days and two



CRITERION	RATING	COMMENT
		days off. The total annual working hours do not exceed the legal limit of 2432 hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System to ISO 45001:2018. In conformance with the Management System requirements, the OH&S Policy is implemented, reviewed periodically and communicated with Stakeholders: <a href="https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ">https://mp.weixin.qq.com/s/UK74uCqkIHHWuvMB1X6NzQ</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's OH&S Policy is applied to Workers and visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's OH&S policy includes commitment to prevent Workers from injury and harm in the workplace. Workers are provided with the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them. Workers are aware of their right to refuse the unsafe work without undue consequence.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented OH&S Management System and holds a valid ISO 45001:2018 certification. However, it was found that a pre-employment occupational medical check was not undertaken for one Worker who is exposed to noise at work.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of Worker consultation and participation in health and safety. Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Worker representative and the management responds.
11.4 OH&S performance	Conformance	The Entity has established Occupational Health and Safety targets and improvement plans are documented in OH&S Program. The implementation plans are established and implemented. The targets are monitored monthly and relevant action taken if necessary.

## **Document Control and Version History**

Revision	Date	Notes
0	18 January 2021	Initial Certification Audit
1	31 August 2022	Surveillance Audit Include the Entity's country location in the Certification Scope.