
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ANHUI ZHONGJI BATTERY FOIL SCIENCE & TECHNOLOGY CO., LTD.

CERTIFICATE
NUMBER

104

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

11 DECEMBER 2020

DATE OF EXPIRY

10 DECEMBER 2023

CERTIFIED SINCE

11 DECEMBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Anhui Zhongji Battery Foil Science & Technology
Co., Ltd. located at 88 Yinghua West Road, Suixi
Economic Development Zone, Anhui Province,
China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Zhongji Battery Foil Science & Technology Co., Ltd.
CERTIFICATION SCOPE	Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (9 – 10 October 2020)• Surveillance Audit (16 – 17 August 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 9 – 10 October 2020 (Initial Certification Audit)• 16 – 17 August 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 9 November 2020 (Initial Certification Audit)• 9 September 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 10 October 2020)</u></p> <p>Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and main production processes include remelting and casting, cold rolling, and finishing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (16 – 17 August 2022)

Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and the main production processes include remelting and casting, cold rolling, and finishing.

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.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

11 December 2020 – 10 December 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

10 December 2023

CERTIFICATE
NUMBER

104

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certification. The management process for the identification and assessment of ASI-related legal requirements and other requirements is established, implemented, and maintained. The legal compliance register is used to identify and maintain relevant information. A compliance evaluation is conducted once a year, and the result is recorded. In the internal audit and management review meeting, the status of legal compliance and other requirements has been reviewed. The training demands for ASI-related requirements are identified and the associated training courses are provided to employees. The legal compliance assessment is available in the Sustainability Report 2021 at:</p> <p>http://www.ahzjalufoil.com/uploadfile/file/1660118746.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented the Policy and procedures to manage Anti-Corruption, (e.g., Management Procedure of Anti-Corruption, Management Procedure for Gift and Entertainment). The Entity has developed and implemented whistleblowing mechanisms (e.g., a suggestion box, hotline: 0561-7976888, mailbox: 273308686@qq.com, a declaration of conflict of interest, etc.). The whistleblowing channel is published to the employees and interested parties. For employees in high-risk positions of Corruption, relevant Anti-Corruption training has been provided and implemented. And these employees are required to sign the letter of Commitment to Anti-Corruption. All employees are required to report when they have provided and received gifts from business partners.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented measures, including training and communication to raise awareness about the code among business partners and suppliers. The relevant information is available for all interested Stakeholders at:</p> <p>http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106171252.pdf</p>

CRITERION	RATING	COMMENT
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented management Policies that are consistent with ESG practices. All policies are available at: http://www.ahzjalufig.com/uploadfile/file/20220106/20220106171223.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies and procedures are reviewed and updated regularly.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's Policies are available for internal and external Stakeholders through training, posted on-site and on the website. The Policies can be found at: http://www.ahzjalufig.com/uploadfile/file/20220106/20220106171223.pdf
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative to have overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Social Management System. The main social and Occupational Health and Safety (OH&S) 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 cover responsible sourcing. The Entity conducts second party Due Diligence audits of major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. The Responsible Purchasing Policy is available at: http://www.ahzjalufig.com/uploadfile/file/20220106/20220106171158.pdf
2.5 Impact Assessments	Conformance	The Entity has established and implemented documented procedures to identify and assess the risks on Social, Environmental, OH&S and

CRITERION	RATING	COMMENT
		Governance aspects. The Entity has implemented a process to identify and assess the developments, expansions, and significant changes of operating Facilities and New Projects to determine if there are environmental and/or social risks and impacts and address the impacts.
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented Emergency Response Plans, provided personnel training, and maintained drill records.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions and no such activity has occurred since its establishment in 2011.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment and no such case has occurred since its establishment in 2011.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social, and economic impacts in its Sustainability Report 2021: http://www.ahzjalufoil.com/uploadfile/file/1660118746.pdf
3.2 Non-compliance and liabilities	Minor Non-Conformance	The Entity has demonstrated there were no fines or penalties imposed in 2021 and 2022. This was verified with management interviews and the official websites of relevant government agencies and Non-Government Organisations (NGOs). However, this information is not publicly disclosed.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has only made payments to governments such as taxes, on a legal basis. the Entity's 2021 annual financial report is audited by a third party finance auditing firm.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established internal and external whistleblowing, complaints, and grievance mechanisms (e.g., whistleblower hotlines, mailbox, and suggestion box). The email address for whistleblowing for external Stakeholders is included within the Entity's Responsible Purchasing Policy: http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106171158.pdf

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) that covers its major Product lines such as re-melting and casting, and the Aluminium strip production line.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has produced cradle-to-gate LCA information for its Aluminium Products. The assessment report can be provided to customers as requested. To date, no request has been received. The Environmental LCA Report is available at: http://www.ahzjalufoil.com/uploadfile/file/1648607887.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has published its Environmental LCA Report on its website: http://www.ahzjalufoil.com/uploadfile/file/1648607887.pdf Public communications on the LCA include access to the LCA information which includes the assumptions and system boundaries.
4.2 Product design	Conformance	The Entity has integrated relevant objectives in the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the product. The Entity's systems documentation related to product design include objectives covering resource efficiency, recyclability, scrap tolerance etc.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has an established target to collect, recycle or reuse 100% of Process Scrap. Process Scrap is packaged and sent to the smelter or other factories for recycling. Further information is included in the Solid Waste Report: http://www.ahzjalufoil.com/uploadfile/file/1660118572.pdf
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented a process to separate Aluminium alloys and grades for recycling. Process Scrap is identified by the types of alloys and stored separately.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities, and targets. The Entity communicates with its main customers to discuss how to improve the recycling rate of Products at end-of-life. Currently, customers return

CRITERION	RATING	COMMENT
		non-conforming Products to the Entity for re-work or cutting into a small size for re-use. The generated target for the Process Scrap utilisation rate is 100%.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	In China, there are no local, regional, or national Collection and recycling systems for Aluminium. The Entity works with the customer to decide how to improve the recycling rate of Products at end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has tracked, calculated, and annually documented its major Scope 1 and 2 Greenhouse Gas (GHG) Emissions and energy use: http://www.ahzjalufoil.com/uploadfile/file/1660619388.pdf The 2021 GHG Emission reports were not verified by a Third Party.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target for 2022. The Entity aims to reduce GHG Emissions intensity by 2% based on 2021 levels. The main strategy is to reduce unnecessary electricity consumption and reduce gas consumption. The information is available at: http://www.ahzjalufoil.com/uploadfile/file/1660118679.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has developed and implemented an air emissions management plan with actions and controls to mitigate adverse impacts. The waste air generated by the Entity is collected and treated before discharge and emissions meet the local discharge limit.
6.2 Discharges to Water	Conformance	The Entity has established an Environmental Management System which addresses and manages Discharges to Water. The Entity's

CRITERION	RATING	COMMENT
		wastewater monitoring reports indicate major pollutants meet the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The major risk areas of operations where Spills and Leakage may contaminate air, water and soil have been assessed by the Entity internally and by an external third party
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed an environmental incident Emergency Response Plan that identified and assessed major risks of Spills and Leakage. The control measures are established and implemented to prevent Spills and Leakage and the preparedness for the emergency. Training courses were provided to relevant Workers, and the annual drill for oil leakage was planned and conducted. The responsibility for external communication on Spills and Leakage is defined in the Emergency Response Plan.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has defined the process of how to report Spills and Leakage within its Emergency Response Plan. The responsibility for reporting is with the Emergency Response Team. No Spills and Leakage occurred in 2021 and 2022.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The Entity has developed a procedure to report incidents to relevant Stakeholders, and the impacts and remedial actions taken. The information will be included in the annual sustainability report and published on the Entity's website. According to the official website of the local environment protection bureau and NGOs, no incidents of Spills and Leakage occurred in the past two years. However, it was identified that the Entity has not disclosed information that no Spill and Leakage occurred in 2021.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. Waste management is addressed in the Environmental Management System. An inventory of waste generated in the operation is established, and the control methods for the different types of waste are defined. The main Hazardous Wastes are diatomite with oil and waste oil including rolling oil and mineral oil. Hazardous Wastes are transferred to qualified suppliers for disposal, which complies with legal requirements. Each transfer is registered on the specific website of the

CRITERION	RATING	COMMENT
		Environment Protection Ministry and transfers are audited.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the information on waste generation and disposal in the 2021 Waste Management Report on its website: http://www.ahzjalufig.com/uploadfile/file/1660118572.pdf
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 transfers all Dross to a licensed disposal supplier for treatment as Hazardous Waste in accordance with the legal requirement. The supplier processes the Dross to recover the final Product, calcium aluminate.
6.8b Dross (recycling)	Conformance	In accordance with the legal requirement, all Dross generated by the Entity is transferred to a licensed supplier to produce the calcium aluminate as raw material, the utility rate is over 95.6%.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	Dross is classified as Hazardous Waste in China and must be transferred to a licensed supplier for disposal. The Entity has communicated with the supplier to ensure Dross residues are not sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water source is the municipal water supply and water usage is tracked and documented.
7.1b Water assessment (risk assessment)	Conformance	The Entity has developed an Environmental Impact Assessment (EIA) report in which the water discharge is identified and assessed, and the water risk assessment was conducted. The Entity's Area of Influence was taken into consideration. Due to the nature of the Product, the production processes, and the local water environment, the level of water-related risk is low.
7.2a Water management (management plans)	Conformance	The Entity has identified there are no significant water-related risks. The Entity treats the sanitary and cooling wastewater before discharge into the municipal drainage system. No other control measures are needed.
7.2b Water management (monitoring)	Conformance	The Entity treats the sanitary wastewater that is used for cooling before discharge into the municipal drainage system. Wastewater is monitored annually, with 2021 and 2022 monitoring reports indicating the major pollutants in the wastewater meet the legal discharge limits.
7.3 Disclosure of water usage and risks	Conformance	The Entity has implemented the information exchange management procedure and disclosed the Water Inventory Map: http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106153606.pdf And the Water Risk Assessment Report: http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106171051.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a Biodiversity assessment, as part of the Environmental Management System. The risk or impact by the Entity on its Area of Influence on biodiversity was assessed as low. The assessment involved third parties and the report was approved by the local Environmental Protection Bureau (EPB). Further

CRITERION	RATING	COMMENT
		information on the Biodiversity Risk Assessment Report is available: http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106171011.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Entity's 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 Entity's biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity risk assessment did not identify significant biodiversity impacts.
8.3 Alien Species	Conformance	The Entity uses wooden pallets as the main carrier, all pallets are fumigated before use to prevent the introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing 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 Policy with the commitment to respect Human Rights and has communicated it to all employees. http://www.ahzjalufoil.com/uploadfile/file/20220106/20220106171223.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established and implemented a Human Rights Due Diligence process. According to the assessment report, the risks to Human Rights are identified and assessed, and the major risks identified are in the supply chain. The Entity's Code of Conduct is communicated to major suppliers who sign a conformance letter and complete online training. The associated mitigation and control

CRITERION	RATING	COMMENT
		measures are established and implemented, such as audits for major suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has identified its major risks are within the supply chain. The Entity has implemented and established management procedures for suppliers and on-site Contractors. The major suppliers are audited on-site to assess and control the risks and negative impacts. The Entity has demonstrated through the audit reports of suppliers no adverse case was reported. No negative news is found online regarding Human Rights issues related to the Entity and its major suppliers.</p> <p>The complaint and grievance channels are established, and Stakeholders including Workers can use suggestion boxes, public email, and a hotline to report grievances, concerns, or complaints. Worker representatives can lodge grievances, concerns, or complaints on behalf of Workers.</p>
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women and has implemented an Equal Employment Opportunity Policy. The Policy is communicated to all employees through on-site notices and training. No complaints have been received from women Workers, who have stated they know their rights.
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 cultural and sacred heritage sites or values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no project which has required Resettlement in the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no project which has required Resettlement in the history of the Entity.

CRITERION	RATING	COMMENT
9.7a Local Communities (rights and interests)	Not Applicable	The Entity has established a Policy to commit to respecting the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. However, the Entity is located within an industrial zone with no nearby Local Community.
9.7b Local Communities (impacts)	Not Applicable	This Criterion is not applicable as the Entity is located within an industrial zone with no nearby Local Community.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable as the Entity is located within an industrial zone with no nearby Local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is committed to not using conflict minerals and has communicated this through the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a letter of commitment not to use conflict minerals. No complaint on this issue has been received.
9.9 Security practice	Conformance	The Entity has defined within the security Workers signed contract, the Policies and Procedures that state the Entity's commitment and approach to security activities that respect Human Rights such as not permitting body searches. Training is provided to ensure security guards understand their tasks and how to respect Human Rights. No grievances or complaints against security activities are received.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity has demonstrated they respect the right to Freedom of Association and Collective Bargaining and commits itself to respecting Workers' rights. There is one Worker committee with sixteen Worker representatives including three women.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity has implemented a Policy of respecting Workers rights related to Freedom of Association and Collective Bargaining. There are no Collective Bargaining Agreements in the company.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has demonstrated respect for the right to Freedom of Association and Collective Bargaining. Workers' representatives can deal with concerns with management on behalf of Workers. Workers are aware of the complaints process and know how to report their concerns.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Conformance	The Entity has established a Policy on Child Labour prohibition. The age of the candidate is verified by checking their identification cards and through interviews. There is no Child Labour or any young Workers in the company. The youngest Worker on-site was 18 years old and joined the Entity on 1 June 2022.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a management procedure to protect young Workers (16 to 18 years) in compliance with the local legal requirements and to not allow young Workers to work under hazardous working conditions. There is neither Child Labour nor any young Workers in the Entity.
10.2c Child Labour (worst forms)	Conformance	The Entity has committed itself and expects its suppliers to comply with the prohibition of Child Labour. The Entity communicates the requirement to the Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity has committed itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery, and Human Trafficking. The Entity communicates to the Workers and suppliers on this issue to guarantee there is no Forced Labour internally and throughout the supply chain. No case of Human Trafficking has been reported or heard of.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. This was verified through interviews with Workers and management and payroll review. No employee is required to provide any form of deposit, Recruitment Fee or equipment advance at any stage of employment.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established a Policy and procedure to prohibit any form of Forced Labour. There are no Migrant Workers in the Entity, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity prohibits any form of Forced Labour and does not provide any form of loan to Workers. This was verified in the labour contracts signed between the Entity and Workers where no term of Debt Bondage is included, and the payslips of Workers do not indicate any illegal deduction.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict Workers' freedom of movement at the site. Workers are free to leave the factory when not engaged in work and can move freely when needed to access basic liberties, such as going to the bathroom and drinking water. External medical facilities can be accessed by Workers as required.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain the original documents of Workers, only copies are kept in the Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's 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, the required notice time for terminating employment follows Labour Contract Law, 30 days in advance or three days within the probation period. Employees who have resigned are immediately paid all entitlements.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. The Entity's recruitment advertisement and training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than on other personal characteristics. This was verified through Worker interviews who confirm they are treated equally in the company. No case of Discrimination has been received.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and Worker representatives. Communication channels are provided to Workers where they can make complaints and raise concerns regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment.
10.6 Disciplinary practices	Conformance	Payslips reviewed indicate wages are not deducted for disciplinary reasons. All interviewed Workers understand the disciplinary measures and the process to appeal.
10.7a Remuneration (living wage)	Minor Non-Conformance	The Entity has established a wage structure that is clearly defined, and the basic wage meets the legal minimum wage. The total payment meets the Workers' basic needs. However, issues related to social insurance and Overtime payments were identified.

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	The Entity documents wage payments and all Workers are paid in a timely manner by bank transfer on the 15th of the following month. Detailed information on wages, allowance, Overtime work compensation, and deductions are included on the payslip.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded manually. The regular Working Time is 40 hours a week over 5 days for office staff. For Workers at a workshop, there are three groups for two shifts and the working hours are a maximum of 60 hours per week with one day off every seven days. However, it was identified in a sample of working hour records that the total annual working hours exceeded the legal limit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy. It is reviewed periodically and is communicated to Stakeholders. The continual suitability, adequacy and effectiveness of the Policy are reviewed in the annual management review meeting. The Entity has a valid ISO 45001:2018 certification.
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.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has implemented systems to identify all applicable legal requirements and other requirements and to evaluate legal compliance at least once a year.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity provides Workers with training courses to understand OH&S hazards, risks and actions that are relevant to them and the right to refuse unsafe work. The Entity has implemented measures to protect Workers from undue consequences for doing so.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented its OH&S Management System and holds a valid ISO 45001:2018 certification. However, the Entity did not comply with the legal requirement associated with occupational health examinations for employees with a diagnosed health condition.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a system of consultation and participation for OH&S. Workers are encouraged to report their concerns or advice on OH&S issues independently or through a Worker representative. Management responds to the concerns and advice on OH&S issues from Workers.
11.4 OH&S performance	Conformance	The Entity has established two OH&S targets, and improvements are implemented and documented in the OH&S Program. The implementation plans are established and implemented, and the achievement status of the targets is monitored periodically. Currently, the implementation of the management programs for the OH&S targets is on track.

Document Control and Version History

Revision	Date	Notes
0	11 December 2020	Initial Certification Audit – Full Certification
1	21 June 2022	Revised to reflect updated Entity Name from Anhui Maximum Aluminium Industries Co., Ltd.
2	10 October 2022	Surveillance Audit – Full Certification