
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

JIANGSU GOKA LIGHT ALLOY CO., LTD.

CERTIFICATE
NUMBER

266

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

30 MARCH 2023

DATE OF EXPIRY

29 MARCH 2026

CERTIFIED SINCE

30 MARCH 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Goka', written over a white background.

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

Jiangsu Goka Light Alloy Co., Ltd. located in Xiangshui County Industrial Park, Yancheng City, Jiangsu Province, China. Goka produces various aluminium extrusion profiles and fabrication products to customers.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Goka Light Alloy Co., Ltd.
ENTITY NAME	Jiangsu Goka Light Alloy Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Goka Light Alloy Co., Ltd. located in Xiangshui County Industrial Park, Yancheng City, Jiangsu Province, China. Goka produces various aluminium extrusion profiles and fabrication products to customers.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 12 – 14 January 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 23 February 2023
AUDIT SCOPE	<p>The audit scope covered the activities at the production plant Jiangsu Goka Light Alloy Co., Ltd. for the manufacture of aluminium extrusion and fabrication products including aluminium profiles and parts.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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

30 March 2023 – 29 March 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

29 September 2024

CERTIFICATE
NUMBER

266

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has established a procedure to obtain applicable legal laws and regulations. The quality department, Environment, Health & Safety (EHS) department and Human Resources and Administration department are in charge of the legal law and regulation collection and assessment at least once per year, covering labour, ethics, health and safety and environment. However, it was identified that some laws and regulations are not updated.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has implemented policies and processes to identify and prevent Corruption including training. The Entity works against Corruption in all its forms, including extortion and Bribery, consistent with Applicable Law and prevailing international standards. Until now, there have been no cases of misconduct. However, according to the Entity's Anti-Corruption Policy, all suppliers and key employees must sign the anti-Corruption agreements. The Entity has signed anti-Corruption agreements with suppliers, but some key employees have not signed the anti-Corruption agreement, which does not meet the Entity's Anti-Corruption and anti-Bribery management policy.
1.3 Code of Conduct	Conformance	The Entity has formulated an ASI Code of Conduct, that includes environmental, social and governance principles. The Entity undertakes an internal audit and management review every year to review the Code of Conduct. And provides related training on the Code of Conduct to employees.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an Environmental, Social, and governance policy. The content of the policy supports ASI Performance Standard requirements and is relevant to the Entity's business.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Environmental, Social, and Governance policies are approved by the General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	The Entity has established an ASI Performance Standard Manual, including policies and procedures which are published on the Entity's information bulletin board, and sent to the Entity's clients and suppliers. However, it was identified the policy is not

CRITERION	RATING	COMMENT
		communicated to Workers clearly and did not provide related training to Workers as planned.
2.2 Leadership	Conformance	The Entity has appointed a Management Representative with the responsibility and authority for implementing the Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an ASI Management System, which includes a social Management System component. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity is highly committed to responsible sourcing. The Entity has implemented responsible sourcing activities through the signing of ASI Commitment Letters, supplier assessments and emphasis on suppliers to implement the ASI Performance Standard requirements. However, the Entity did not implement the Supplier Management Procedure effectively as some suppliers did not sign the commitment letter or conduct the assessment according to the internal procedure.
2.5 Impact Assessments	Conformance	The Entity has established and implemented Human Rights Due Diligence procedures and a Management System covering environmental, social, cultural and Human Rights Impact Assessments. All assessments are implemented for existing projects. There have been no new projects or major changes since the establishment of the Entity.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity has adequate and effective emergency response plans, which include crisis organisation, communication guidelines and business recovery plans. The emergency response team has been established and trained annually. However, the Entity did not establish an emergency response program for the potential impacts to the community, labour and/or Human Rights following an emergency incident.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger and acquisition management procedure. Until now, no mergers and acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established closure, decommissioning and divestment management procedures. Until now,

CRITERION	RATING	COMMENT
		no closure, decommissioning or divestment has occurred in the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed a sustainability report which disclosed its governance approach and its material environmental, social and economic impacts. The report is disclosed to the Stakeholders according to the requirement, available at: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=23
3.2 Non-compliance and liabilities	Conformance	The Entity has no non-compliance or liabilities recorded in the Sustainability Report. The government-related websites (https://www.gsxt.gov.cn) and non-governmental organisation websites (https://www.qcc.com), no such case was raised by the government agencies.
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 tax payment certificate.
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	This Entity has established and operates a Stakeholder complaints, grievances and requests procedure, which has been formulated to publicise the Entity's contact telephone number, email address, suggestion box and other information to Stakeholders through the public board, accepting information inquiries, complaints and appeals from all parties. The Human Resources Department sets up posts to track the requests and complaints of Stakeholders with appropriate resolution mechanisms.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes for Life Cycle Assessment (LCA) requirements. LCAs for all related products have been finished according to the LCA management procedure and the LCA report shows the defined procedures and processes are followed accordingly. The LCA report is available on the Entity's information bulletin board and the Sustainability Report: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=23

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products. The LCA focuses on the environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments.</p> <p>The LCA studies are available upon customer request. The Environmental Life Cycle Assessment Report can be provided by external communication. It is also publicly on the Entity's information bulletin board.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Environmental Life Cycle Assessment Report is published on the Entity's information bulletin board.</p>
4.2 Product design	Conformance	<p>The Entity has established and implemented a product design procedure and integrates relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has minimised the generation of Aluminium Process Scrap within its operations and the generated target of scrap for collection, recycling and/or re-use, is 100%.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has an Aluminium production waste and scrap management process to classify and dispose of the different kinds of Aluminium Scraps. All scrap material is classified through alloy separation and disposed of by different smelters. Related records are kept for review.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has developed a recycling strategy including specific timelines, activities and targets. The Entity is in ongoing discussions with its main customer on how to improve the recycling rate of its products at end-of-life.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>There are no complete local, regional or national collection and recycling systems for Aluminium Scrap in China. The Aluminium production waste is entrusted to a local company for remelting and recycling. The Entity is working with the customer to decide how to improve the recycling rate of products at end-of-life. Recycling contracts with customers to collect the scraps of products at end-of-life and related recycling records are kept.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has accounted for and publicly discloses material GHG Emissions and energy use by source on an annual basis on the information bulletin board and the Sustainability Report: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=23
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG emission reduction target for 2023 and shall reduce the GHG Emissions per product based on the level of 2022. The main strategy is to reduce unnecessary electricity consumption and increase the ratio of green energy. The reduction target is published in the Sustainability Report: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=23
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 pollutants in air emissions are quantified in the Environmental Impact Assessment Report. T. The status of the air emission is monitored and meets the local legal emission limit.
6.2 Discharges to Water	Conformance	The Entity has established water reduction targets and established a related plan to minimise adverse impacts. The monitoring reports for wastewater show major pollutants were monitored. The monitoring results for these major pollutants achieve the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity undertakes regular Spill and Leakage assessments with leak risk assessment reports. No high-risk situations have been identified, and the Entity has taken preventive action or implemented improvement programs for the potential risks identified.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established an emergency response plan which includes external communication processes. Assessment and management of Spills

CRITERION	RATING	COMMENT
		and Leakage are defined in the Environmental Management System and follow the control measures in the list of spill risk factors. Major Spills and Leakages will be managed and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an Emergency Response Plan and Response Guide defining how to dispose of and report spills. If there is a spill, the Emergency Response Team (ERT) would follow the response process to deal with it accordingly, and drills are conducted annually to ensure the process is up to date. The Entity has never had a spill-related accident, this information is also disclosed in the annual Continual Development Report. The Entity will report the spills to local authorities and impacted units and people immediately.
6.4b Reporting of Spills (regular reporting)	Conformance	No spill has occurred in recent years. The Emergency Response Plan and Response Guide define that the Entity will report the spills to local authorities and impacted units and people immediately and disclose it in the annual Continual Development Report, which is available upon request.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy, which included the Hazardous Waste being transferred to qualified suppliers for treatment. The Entity has continual improvement targets to reduce the waste generation per unit. The management team quarterly reviews the targets.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the information about the quantity of Hazardous and Non-Hazardous Waste generated and associated waste treatment methods used in the 2022 Annual Sustainability Report, page 9: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=2 The Sustainability Report is published on the Entity's information bulletin board.
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.

CRITERION	RATING	COMMENT
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.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a water-related risk analysis, including water balance, to determine and map the source and type of water it draws and uses. The Entity has a water balance report, water resources management goals and plans, and a water balance chart.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The water risk assessment considered the Entity's location within an industrial park, nearby lands and waterways risk in their Area of Influence. Due to the nature of the product and production processes, and most of the Entity's sites have closed-loop water Management System in the local water environment, the level of water-related risk was found to be low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, 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 to the Entity's Certification Scope, 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's ASI Manual defines the policy and procedure on how to publish water management information. The Entity has conducted water risk assessments. The Water usage and risks assessment report is published on the Entity's information bulletin board and the Entity's Sustainability Report: http://dd767518.aly49.qzkey.com/News.aspx?ClassID=23
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has established procedures for the protection of biodiversity. A biodiversity risk assessment report has been prepared. The Entity is located in an industrial park developed by the local government, there is no protected flora or wildlife in this area. There is no significant risk of biodiversity impact.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, 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 to the Entity's Certification Scope, as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.3 Alien Species	Conformance	The Entity has evaluated and implemented control risks of Alien Species, which may be accidentally introduced by the Entity through operational activities. As per the biodiversity risk assessment report, the only source which could introduce the Alien Species are wooden pallets used for a product package.

CRITERION	RATING	COMMENT
		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 Social and Environmental Governance Policy, which includes a policy commitment to respect Human Rights, respect employees’ civil rights and eliminate Discrimination, which is communicated and trained to all employees, and published on the Entity’s information bulletin board.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity commits to respecting Human Rights and aims to extend this commitment in the supply chain. The Entity has established a Human Rights Due Diligence process covering the supply chain. However, it was identified a sample of assessments determined that some suppliers have not completed the Human Rights Due Diligence assessment.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report, and no adverse Human Rights impacts have been reported since its establishment and remediation is not required. A remediation process towards any adverse Human Rights impact is available.
9.2 Women’s Rights	Conformance	The Entity has developed a Women’s Protection Management Procedure including protecting women’s rights and interests. The Entity clarified the legitimate rights of women and implemented control measures to ensure that those rights were met. No complaints are received from women Workers, and they know their rights.

CRITERION	RATING	COMMENT
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 is no cultural and sacred heritage 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 causing resettlements in the history of the Entity. The Entity is located in an industrial park developed by the local government.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as there is no project causing resettlements in the history of the Entity. The Entity is located in an industrial park developed by the local government.
9.7a Local Communities (rights and interests)	Conformance	The Entity has formulated and implemented a Community Participation Management Procedure 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 while exploring opportunities to respect and support community livelihoods with the Xiangshui Industrial Economic Zone. There have been no complaints received from Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity is in close contact with surrounding communities. Most employees are from the local area. The facility has installed environmental protection devices, such as an air emission treatment facility, to reduce the impact on the surrounding communities caused by air emissions and boundary noise, which is also indicated in the Environmental Impact Assessment Report.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with surrounding communities. Most of its employees are from the local area. The Entity has established a plan to support the surrounding communities such as supporting the local charities and participating in community public welfare activities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a Control of Conflict Minerals Procedure, makes a commitment not to use conflict minerals and communicates it through the

CRITERION	RATING	COMMENT
		Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign the commitment letter not to use conflict minerals. To date, no complaint on this issue has been received.
9.9 Security practice	Conformance	The Entity has implemented a Security Service Management System. The Entity also clearly define the primary role of security guards which is to protect people, property and or assets and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have been reported.
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 has implemented Freedom of Association and collective consultation procedure to respect the right to Freedom of Association and Collective Bargaining. The Entity commits itself to respect Workers' rights. A Labour Union and association for Workers were established in accordance with the legal requirement, on behalf of staff rights such as labour remuneration, working hours, rest and vacation, labour safety and health, vocational training, insurance and welfare.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. Although there are no Collective Bargaining Agreements in the company, the Entity respects the rights of Workers to Collective Bargaining and has a Policy of respecting rights related to Freedom of Association and Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for Workers, Labour Unions exist at the Entity.
10.2a Child Labour (minimum age)	Conformance	The Entity formulates and implements a Child Labour Rescue Policy. The age of each candidate is verified through an interview and the reviewing of identification cards. There is no incidence of Child Labour or any young Workers in the company. The youngest Worker on site is 20 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a Management Program for Child Labour and Young Workers. The Entity does not support any kind of Child Labour. Young Workers are under special protection by labour standards law and are not allowed to work in hazardous working conditions. The Entity does not recruit Child Labour or young Workers.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour. There is neither Child Labour nor any young Workers in the Entity. 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 established and implemented an Anti-Forced Labour Management Procedure, it commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Forced Labour is prohibited and stipulated in the employee handbook. No type of Forced Labour is found in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. This is verified by Worker and management interviews and reviewing payroll, all employees are not required to submit any form of deposit; recruitment fee or advances at any stage of the employment.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers in the Entity, all Workers are Chinese. The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity prohibits any form of Forced Labour and does not provide any form of loans to Workers. In the labour contracts signed between the Entity and Workers, no term of Debt Bondage is found. The pay slips of Workers indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity is not involved in Forced Labour. There is no restriction on Workers' freedom of movement at the site. Workers are free to leave the factory when not engaged in work; Workers move freely when needed to access basic liberties, such as going to the toilet and drinking water. They can go to external medical facilities when they are feeling unwell. Interviewed employees stated there were no constraints.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. There is no retention of original documents of the Workers, only copies of original documents are kept in Workers' personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The time for announced termination of employment is in compliance with the labour contract law: thirty days in advance or three days in the probation period.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Procedure to ensure equal opportunity and it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	The Entity has formulated and implemented an Employee Complaints Management Procedure. Regular meetings are held between the trade union and the Entity's senior management. Grievance and complaint hotline and email, as well as operating procedures, ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity has established a Rewards and Punishment Management Control Procedure and does not tolerate any form of punishment or harassment. Suppliers are required to comply with the procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker representation. All disciplinary records need to be confirmed by Workers and management.
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented Salary and Welfare Management Procedures. The wage structure is clearly defined, and the basic wage complies with the local legal minimum wage. The compensation for Overtime work meets the legal requirements. The total payment meets the Workers' basic needs. All employees enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and promptly paid to all Workers by bank transfer on the 25th of every month.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The working hours are recorded and managed. According to site observation, Worker interviews and review of records, the working hours are monitored and are in compliance with Chinese labour law. The total weekly hours do not exceed sixty, and at least one day of rest in a week is guaranteed.
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. The Occupational Health and Safety Policy is approved by General Manager and posted on the Entity's information bulletin board.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has established sufficient and effective management manuals and procedures to ensure that all employees and related parties comply with the internal Occupational Health and Safety Policy, including induction training for new employees, regular physical examinations and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has systems in place to identify all applicable legal requirements, and other requirements and to evaluate legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an OH&S Management System, implements relevant laws and regulations, and through training, provides knowledge to employees of the job hazard factors and their right to refuse unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has established adequate procedures for OH&S control, including occupational disease control and emergency drills, which meet applicable domestic and international Standards. However, based on on-site observation some chemicals (e.g., cutting fluid) lacked material safety data sheets (MSDS), and the hydraulic oil storage area was not equipped with an eye washing station according to MSDS requirements.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a safety committee to collect employee feedback on OH&S including safety committee meetings, suggestion boxes, congress and irregular Worker interviews. Records have been retained since its establishment.
11.4 OH&S performance	Conformance	The Entity has established performance indicators and improvement measures in OH&S. For example,

CRITERION	RATING	COMMENT
		in the annual OH&S promotion plan, there is a target implementation plan, and monthly statistics are made on the completion of the target.

Document Control and Version History

Revision	Date	Notes
0	30 March 2023	Initial Certification Audit – Full Certification