

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Taishan City Kam Kiu Aluminium Extrusion Co., Ltd

CERTIFICATE NUMBER

136

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CHINA QUALITY
MARK
CERTIFICATION
GROUP

DATE OF ISSUE

31 JANUARY 2024

DATE OF EXPIRY

30 JANUARY 2027

CERTIFIED SINCE

21 JULY 2021

AUTHORISED BY

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

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*

CERTIFICATION SCOPE

Taishan City Kam Kiu Aluminium Extrusion Co., Ltd is located on Shiqiao Industrial Zone, Dajiang Country, Taishan City, China. The company mainly manufacture construction and industrial aluminium profiles and grille.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kam Kiu Aluminium Products Group Limited
ENTITY NAME	Taishan City Kam Kiu Aluminium Extrusion Co., Ltd
CERTIFICATION SCOPE	Taishan City Kam Kiu Aluminium Extrusion Co., Ltd is located on Shiqiao Industrial Zone, Dajiang Country, Taishan City, China. The company mainly manufacture construction and industrial aluminium profiles and grille.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (28 February – 5 March 2021)Re-Certification Audit and Scope Change (6 – 8 March 2023)
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">28 February – 5 March 2021 (Initial Certification Audit)6 – 8 March 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">24 May 2021 (Initial Certification Audit)5 July 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (28 February – 5 March 2021)</u></p> <p>The audit scope included the activities involved in the production of the following products: aluminium alloy industrial profiles, building profiles and aluminium grates, from the Taishan City Kam Kiu Aluminium Extrusion Co., Ltd. located in Shiqiao Industrial Zone, Dajiang Town, Taishan City, Guangdong Province, China.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit and Scope Change (6 – 8 March 2023)</u></p> <p>The audit scope included the activities involved in the production of aluminium alloy industrial profiles, building profiles and aluminium grates at Taishan City Kam Kiu Aluminium Extrusion Co., Ltd.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses

-
- Semi-Fabrication

All applicable 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 31 January 2024 – 30 January 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 30 July 2025

CERTIFICATE NUMBER 136



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Entity, a manufacturer of Aluminium extruded profiles, is located in Shiqiao Industrial Zone, Dajiang Town, Taishan City, Guangdong Province, China. The Entity's products are used in a wide range of applications including consumer electronics, automotive, aerospace and marine applications, renewable energy systems and in construction projects.

The Entity has more than 30 years of production experience with the main activities including Aluminium rod casting, Aluminium extrusion, surface treatment and precision machining activities. The main Stakeholders include the Chinese government, corporate employees, the local environmental and social security agencies.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Low	High	Medium	MEDIUM
RISKS	High	High	High	HIGH
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented its Compliance Evaluation Control Procedure and the Legal and Regulatory Management Procedure, and has evaluated the applicability of laws and regulations and its compliance with relevant Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Anti-Corruption and Anti-Bribery Control Procedures, and has also established an anti-Bribery management team and an anti-Bribery risk assessment team, which performs an annual evaluation of the implementation of anti-Bribery work throughout the Entity.
1.3a-e Code of Conduct	Minor Non-Conformance	<p>The Entity has established a Code of Conduct, including an Environmental Code of Conduct, Social Code of Conduct, and Governance Code of Conduct, which operate effectively. The Entity conducts internal audits and management reviews annually. The regular review of the Code of Conduct is undertaken to address changes in environmental, social and governance risks, ensure the normal and effective operation of the Entity's system, control risks, and address indications of control deficiencies.</p> <p>However, the Entity has not publicly disclosed the Code of Conduct.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established Environmental, Social and Governance (ESG) Policies in the ASI Management Manual and maintains documented information relating to environmental, Occupational Health and Safety, ASI and social governance practices. The General Manager has developed and issued ESG guidelines and has approved and supported each Policy. The Entity undertakes annual management reviews, and the General Manager coordinates the review of the Policy.</p> <p>There are currently no significant changes in ESG risks and control deficiencies. The ESG Policies are communicated internally through documentation, training and on-site presentations, and externally through promotional materials and corporate presentations.</p>
2.2a-c Leadership	Conformance	The Entity has appointed a senior executive as the ASI Management Representative, whose responsibilities are specified in an appointment letter. The Management Representative is responsible for leading and implementing the Policies formulated by the Entity and meeting the requirements of the ASI Performance Standards, and for leading and supervising the communication of the Policies internally and externally.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an ISO 14001:2015 certified Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has developed and implemented the requirements for a social Management System within the ASI Management Manual to manage risks with respect to Human Rights and Labour Rights.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Procurement Control Procedures and Supplier Management Procedures established by the Entity continue to operate effectively and are implemented in accordance with the Entity's ASI Policy, covering environmental, social and governance issues. The Entity has publicly disclosed its updated Responsible Procurement Policy: https://www.kamkiu.com/news/detail/446/</p> <p>The Entity re-evaluates suppliers annually which addresses the ESG risks related to the requirements of the Entity's ASI Policy. The Entity has provisions in its Management Manual to review the Responsible Procurement Policy when changes occur or indications of control deficiencies emerge. There are currently no significant changes in ESG risks and control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, the Entity has developed the Environmental and Occupational Health and Safety Evaluation Control Procedures for New Projects, which stipulates the requirements for New Project declaration, environmental impact and risk assessment, and records.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, the Entity has developed a Human Rights Risk Identification and Assessment Management Procedure, for the identification and assessment of Human Rights risks.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented its Environmental Management System and Occupational Health and Safety (OH&S) Management System, which includes Emergency Preparedness and Response Control Procedures. Emergency Response Plans have been developed for various environmental, social and safety emergencies. The Entity has regularly conducted test activities on emergency procedures to evaluate the appropriateness of emergency plans. The effectiveness of the Emergency Response Plan is evaluated annually. After the occurrence of an emergency or when there are signs of control deficiencies, the Entity will review the implementation of the emergency plan, adjust and modify the plan as necessary.</p> <p>The Emergency Response Plan is available to Stakeholders at: https://www.kamkiu.com/news/detail/446/</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Management Procedure for Closure and Resumption of Work to manage shutdowns and production disruptions, which addresses significant adverse environmental, social and governance impacts in the process. The Human Resources Administration Department reviews the closure and return to work procedures every five years and review of the shutdown management process following any changes to the Entity that alters the nature or scale of environmental, social and governance risks, or where there are indications of control deficiencies.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed a Merger and Acquisition Procedure, including requirements for preparation before implementation, various risks that may arise, and risk avoidance in transactions. When implementing Merger and Acquisition projects, environmental, social and governance factors have been determined as important</p>

CRITERION	RATING	COMMENT
		considerations. There have been no Mergers or Acquisitions since the Entity joined ASI.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established relevant requirements for closure, decommissioning and divestment within the ASI Management Manual. The Closure, Decommissioning and Divestment Control Procedures have been developed to clarify working procedures. In the event of closure, decommissioning and divestment, the Finance Department reviews the environmental, social and governance impacts. There have been no closures, decommissioning or divestment activity since the Entity joined ASI.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has established the relevant requirements for sustainability reporting in the ASI Management Manual. The Entity publicly discloses its governance approach and ESG performance in its annual Sustainable Development Report: https://www.kamkiu.com/news/detail/446/
3.2 Non-compliance and Liabilities	Conformance	The Entity has established the requirements for disclosure of compliance violations and liabilities in the ASI Management Manual. There were no cases of non-compliance or liabilities during 2021-2022, as disclosed in the Sustainable Development Report: https://www.kamkiu.com/news/detail/446/
3.3a-c Payments to Governments	Conformance	All payments made by the Entity to the Government, as required by the Entity's Anti-Corruption Policy, are subject to Applicable Law and the tendering contract. Financial records are maintained for each payment, and financial audits are conducted regularly to ensure that payments and amounts are legal. This information is disclosed in the Sustainable Development Report. There were no financial or political contributions made by the Entity during the review period.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a Control Procedure for Consultation, Communication and Exchange of Information, which includes an appropriate Complaints Resolution Mechanism. The Entity reviews the Complaints Resolution Mechanism annually during internal audits and management reviews. There have been no major changes or indications of control gaps.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	During the identification of environmental factors, the Entity considered the environmental impact of the whole life cycle of its Aluminium products. An Aluminium Life Cycle Environmental Impact Assessment Report has been developed.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed the Aluminium Life Cycle Environmental Impact Assessment Report, which includes the scope and system boundary, inventory analysis, impact assessment and description of results, and addresses Alumina production, electrolytic Aluminium production and Aluminium profile production. The Entity has developed and implemented Life Cycle Assessment (LCA) compliance information requirements and includes LCA information in the Sustainable Development Report. The Entity can provide Aluminium

CRITERION	RATING	COMMENT
		Life Cycle Environmental Impact Assessment Report, however no customers have requested LCA information to date.
4.2 Product Design	Conformance	The Entity has specified the relevant requirements for Product design in the ASI Management Manual. The Entity has implemented the Design and Development Control Procedure, and the LCA procedure is established in the Product design process to consider environmental impacts including energy, consumption, water, air emissions and waste.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a clear process for defining targets for Aluminium Process Scrap for recovery, recycling and reuse. Targets have been distributed to each process and are assessed monthly. The Entity has established procedures to sort different types of Aluminium scrap. In accordance with the Entity's requirements, Aluminium Process Scrap is remelted and reused.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity communicates and collaborates with Stakeholders (partners) to improve recovery and recycling in key Product markets in accordance with the China Ministry of Industry and Information Technology's Aluminium Industry Specification Conditions.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has disclosed its Greenhouse Gas (GHG) emissions and energy usage data in the Greenhouse Gas Emissions Report: https://www.kamkiu.com/news/detail/446/ The Entity's publicly disclosed GHG emissions data have been independently verified.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has established GHG emissions targets and a GHG Emissions Reduction Plan, including a GHG Emissions Reduction Pathway. Progress on the Reduction Plan is reviewed annually. All energy data is monitored and reviewed by the Entity monthly to verify performance against the target. Public disclosure is included on the Entity's website: https://www.kamkiu.com/news/detail/446/

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity has established the Environmental Operation Control Procedure and the Environmental Monitoring and Measurement Control Procedure to enable performance as outlined in the GHG Emission Reduction Plan and achieve the GHG emissions reduction targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity's Emissions to Air are controlled through use of pollution control devices and regular monitoring is undertaken to ensure compliance with local statutory emission limits. The Air Pollutant Emission Reduction Plan has been developed and is reviewed annually. There has been no exceedance of emission limits to date. Air pollutant emission information is disclosed in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
6.2a-g Discharges to Water	Conformance	The Entity Discharges to Water are controlled through use of water pollutant treatment facilities and regular monitoring is undertaken to ensure compliance with local legal discharge limits. The Implementation Plan for the Reduction of Water Pollutants has been developed and is reviewed annually. There has been no exceedance of emission limits. Information is disclosed in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has evaluated the Spills and Leakages that may occur during production and operation and the main impact to air, water and land. The Entity has established Emergency Preparedness and Response Control Procedures and Leakage Emergency Plans. The Production Safety Emergency Plan for Environmental Emergencies is reviewed every three years or following any Spill or Leakage event. The latest version of the Plan is disclosed in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and Leakages is specified in the Entity's ASI Management Manual. The impact assessment of Spills and Leakages and the remedial actions taken are published in the annual Sustainable Development Report. No material Spills or Leakages have occurred since the Entity commenced operations.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity has developed a Waste Management Procedure and publicly discloses the amount of Hazardous Waste and Non-Hazardous Waste generated and the relevant waste treatment methods on the Guangdong Solid Waste Supervision Information Platform on an annual basis. The Entity has established appropriate and effective procedures for the collection and disposal of all waste and has continuous improvement targets to reduce unit waste generation. The targets are reviewed quarterly by the management team. However, there is no quantitative waste data available on the Entity's website or in the Entity's Sustainable Development Report
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope

CRITERION	RATING	COMMENT
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has a dedicated storage facility for Aluminium ash slag that prevents release to the environment, including waterproof and anti-leakage measures, on-line camera monitoring and a combustible gas alarm device. Adequate and effective processes are in place to collect and recover Aluminium slag. The Entity reviews its Aluminium slag recycling management activities every month. The Aluminium slag residue is legally transferred and disposed of through the Guangdong Hazardous Waste Supervision System Platform, and disposed of by qualified units.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has established a Water Resources Management Procedure and has conducted a water risk assessment. A water balance chart is updated annually. The water risk assessment determined the water-related risks as low. Details are available in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water resource risk assessment determined the risks as low.
8 BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has provided an analysis of ecological impact factors in the Environmental Impact Assessment Report, which was conducted by a third party. The assessment determined that the Entity is not located in, or near Protected Areas and that risks and impacts on Biodiversity are considered low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has conducted annual assessments on the potential introduction of Alien Species and implements control measures for high risk. No Alien Species have been introduced.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located in a Government-designated industrial zone, and has made a commitment not to explore or build New Projects in World Heritage Properties.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	The Entity is located in a Government-designated industrial zone, which is not within a Protected Area, and its production and business activities are within an industrial zone.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented its Human Rights Policy and Human Rights Due Diligence Procedures. The Entity conducts an annual survey to identify potential impacts on Human Rights. Review of the Human Rights Prohibition Investigation Procedure is undertaken annually. The Entity has established channels for the resolution of grievances, complaints and recommendations. The Human Rights Policy is disclosed in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has formulated the Procedures for the Management and Control of the Protection of Female Employees, the Prevention and Control of Occupational Diseases, and the Protection and Management of Female Employees, pledging to protect the rights and interests of women and establishing guidelines for the protection of women's rights and interests. The Entity has established a trade union women's federation to protect women's rights and interests, and holds various activities during the annual 'International Working Women's Day'. Business ethics training has been undertaken to inform women employees about preventing sexual harassment and discrimination in the workplace. The Entity's gender equality and women's rights program is reviewed every five years and/or in the event of any changes or control deficiencies. The Entity publicly discloses the results of the measures taken to protect the Rights and interests of women employees in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the Entity's Area of Influence. However, the Entity has established the Indigenous Peoples Protection Procedure, which provides respect for the customs, rights and interests of ethnic minorities and local residents in the region.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated since becoming an ASI member. However, the Entity has established the Indigenous Peoples Protection Procedure, which provides respect for the customs, rights and interests of ethnic minorities and local residents in the region.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Conformance	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated since becoming an ASI member. However, the Entity has established the Indigenous Peoples Protection Procedure, which provides respect for the customs, rights and interests of ethnic minorities and local residents in the region.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the Entity's Area of Influence, nor nearby cultural and/or religious sites. However, the Entity has established procedures for protection of cultural sites and religious shrines and maintains a record of the survey assessment of Indigenous Peoples and heritage sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial park and there are no Indigenous Peoples present in the Entity's Area of Influence, nor are there nearby cultural and/or religious sites.
9.6a-i Displacement	Conformance	The Entity has established Resettlement Procedures to prioritise viable alternatives when designing New Projects and Major Changes to avoid or minimise the displacement of populations. The Resettlement Action Plan is reviewed every five years and in the event of any changes that may lead to a material change in the conditions under which the plan was developed or indications of control deficiencies. However, the Entity has not been involved in any Resettlement since joining ASI.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established and implemented an Influence on Interested Parties Procedure to respect the legal and traditional rights of Local Communities in their land, livelihoods and use of natural resources, while exploring opportunities to respect and support their livelihoods within the Shiqiao Industrial Zone in Dajiang Township. The Entity provides support to the Local Community, including by providing donations and approximately 50 percent of the Entity's employees are from the Local Communities.</p> <p>The procedures are reviewed every five years and in the event of any changes that lead to a material change in ESG risks or indications of control deficiencies. The mitigation plans and results are disclosed in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity's ASI Performance Standard Manual defines the commitment to not contribute to armed conflict or Human Rights violations, and accordingly manages their supply chain, identifies risks in the supply chain and addresses identified risks. The Entity undertakes an annual assessment of both its operations and direct suppliers of raw materials to identify Conflict-Affected and High-Risk Areas (CAHRAs) and to confirm the appropriateness of their Due Diligence practices. The Entity's 2023 list of qualified suppliers confirmed that upstream suppliers of Aluminium ingots used by the Entity are not located in CAHRAs.</p> <p>The Entity's Responsible Sourcing and Due Diligence Policy is available within the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/</p>

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a supply chain risk assessment process and maintains records of the supplier risk assessment. The results of the risk assessment determined that there is no risk of contributing to armed conflict or Human Rights violation in the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined that there is no risk of contributing to armed conflict or Human Rights violation in the Entity's supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were reviewed as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported on its supply chain Due Diligence in the Sustainable Development Report, available at: https://www.kamkiu.com/news/detail/446/
9.9 Security practice	Conformance	The Entity has developed and implemented a Security Code that defines the management responsibilities of security personnel. Training of security personnel is provided to ensure their understanding of their mandate and the manner in which to respect Human Rights. To date, no complaints or complaints regarding security have been received.

10. LABOUR RIGHTS

10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>The Entity has established Trade Union organisations in accordance with Applicable Law, and the Entity allows Workers to freely choose their own Workers' representatives. Each department within the Entity has an employee representative, who is responsible for monitoring and raising issues related to safety, health, welfare and social issues with management.</p> <p>The Entity has established a Procedure for the Management of Free Association and Collective Bargaining, which provides for the right of Workers to freely form, join and organise trade unions and to engage in collective bargaining. There is a Collective Bargaining Agreement between the Entity and the Union. All provisions of the Agreement comply with local legal requirements.</p>
10.2a-c Child Labour	Conformance	The Entity has established and implemented the Administrative Procedures for the Relief of Child Labour and the Protection of Underage Workers, which prohibits the use and/or employment of Child Labour. The youngest Workers at the Entity are over 18 years old, however, the Entity has processes in place to ensure young Workers (16 to 18 years of age) are not exploited, work in hazardous conditions or have their schooling or apprenticeships impacted.
10.3a-c Forced Labour	Conformance	The Entity has established and implemented its Management Procedure for the Prohibition of Forced Labour, which addresses its controls to ensure it does not directly or indirectly engage in or support Human Trafficking; require deposits, Recruitment Fees,

CRITERION	RATING	COMMENT
		<p>advances and/or security deposits; hold Workers in Debt Bondage; restrict Workers' freedom of movement in the workplace an in on-site housing, and; retain any Workers' original documents. The labour contract stipulates the termination of employment.</p> <p>The Entity supports and respects the principles of the Universal Declaration of Human Rights and ensures that it does not participate in Human Rights violations, that it complies with the Labor Law of the People's Republic of China, and do not oppress, violate or enslave employees.</p> <p>The Entity has disclosed its Modern Slavery Statement, available at: https://www.kamkiu.com/news/detail/446/</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has developed and implemented an Anti-Discrimination Management Procedure, established effective monitoring mechanisms, and conducted Human Rights Due Diligence questionnaires to ensure that non-Discrimination principles are implemented in all business activities.</p> <p>The Entity has established a performance appraisal system, which distributes employees' performance fairly and equitably according to the appraisal, and does not discriminate against employees based on age, gender and job type. The Entity's Human Resources Department is responsible for the performance appraisal of employees.</p> <p>The Entity has organised training, publicity and complaint channels, and popularized a culture of non-discrimination. The Entity has a grievance mechanism in place that can address complaints of Discrimination by implementing the Consultation, Communication and Information Exchange Management Procedure.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established and implemented the Consultation, Communication and Information Exchange Management Procedure, and encourages employees to participate in the ASI Management System. The Entity has direct contact with employees and representatives of the Production Safety Management Committee to resolve workplace issues. The feedback communication mechanism of respondents is appropriate and the channels are considered effective.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established procedures for the Management of Punitive Measures, and employees can lodge complaints and feedback on alleged unfair treatment related to Violence and Harassment. The Entity has conducted internal audits and annual management reviews to review the Policy regularly. The Entity's latest Policy is available at: https://www.kamkiu.com/news/detail/446/</p>
10.7a-d Remuneration	Conformance	<p>The Entity has developed and implemented the Compensation Management Procedures. The standard wage paid by the Entity is no less than the minimum standard set by the local government, and the salary received by the employees is sufficient to meet the basic needs of the employees and to provide family support. Salaries and benefits are paid directly to the Workers' bank account on time, once a month, and a clear written payslip is provided detailing the salary and benefits payments.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards regarding working hours and public holidays. The standard working</p>

CRITERION	RATING	COMMENT
		week (excluding Overtime) is 40 hours and Workers have at least one day off for every six consecutive days of work. Overtime work is voluntary and may not exceed 12 hours per week. The Entity has developed and implemented a Working Time Management Procedure with three shifts (8 hours).
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their Rights and provides information through the Workers' congresses and Trade Unions. Employees are also informed of their Rights and obligations through other means such as letters, webmail, phone calls, and interviews.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented its Occupational Health and Safety (OH&S) Management System, which is certified to ISO 45001:2018.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has developed relevant management manuals and procedures and provided training to all employees and related parties to understand and comply with the OH&S requirements. The OH&S Management System is externally audited annually, with a re-certification audit held every three years. Internal audits are conducted annually and/or after a change to OH&S risks and/or on indication of a control deficiency. The Entity publicly discloses the performance of the OH&S Management System in the Sustainable Development Report: https://www.kamkiu.com/news/detail/446/
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an effective mechanism to collect feedback from employees on Occupational Health and Safety issues, including suggestion boxes, a Workers' congresses and Worker interviews.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	21 July 2021	Initial Certification Audit – Full Certification
1	31 January 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply PS V3