

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Suzhou Alutech Automotive Parts Co.,Ltd.

CERTIFICATE NUMBER
404

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**SGS-CSTC STANDARDS
TECHNICAL SERVICES**

DATE OF ISSUE
22 NOVEMBER 2024

DATE OF EXPIRY
21 NOVEMBER 2027

CERTIFIED SINCE
22 NOVEMBER 2024

AUTHORISED BY

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

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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

Design and manufacture of brake
(except 3C) and suspension
components at Suzhou Alutech
Automotive Parts Co.,Ltd located in
Suzhou, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aludyne
ENTITY NAME	Suzhou Alutech Automotive Parts Co.,Ltd.
CERTIFICATION SCOPE	Design and manufacture of brake (except 3C) and suspension components at Suzhou Alutech Automotive Parts Co.,Ltd located in Suzhou, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">6 – 9 May 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 October 2024
AUDIT SCOPE	<p>The Audit Scope included the design and manufacture of brake (except 3C) and suspension components at Suzhou Alutech Automotive Parts Co.,Ltd located in Suzhou, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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 22 November 2024 – 21 November 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 22 May 2026

CERTIFICATE NUMBER 404



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

Aludyne is a leading global, vertically integrated manufacturer of Aluminium, magnesium, and iron cast and machined automotive components. They offer custom engineering and manufacturing solutions for safety-critical products.

The Suzhou Facility (the 'Entity') is located in the Plainvim Xiangcheng Industrial Park of the Xiangcheng Economic Development Zone in Suzhou City, Jiangsu, China. It has an annual production capacity of 4.5 - 5.5 million saleable products.

The Facility was established in 2007 at its original location, No.80 Jingu Road, Suzhou Industrial Park (SIP), Suzhou City, Jiangsu Province, China. Production commenced in 2008, and in 2013, a validation laboratory was set up. The Entity is equipped with three Casting lines, three main melters, one chip re-melter, 18 casters, two heat treatment lines, one continuous LPI line, 32 Computer Numerical Control (CNC) machines, manual and automated assembly lines, and a validation laboratory with eight linear actuators. Ancillary infrastructure on-site includes worker parking spaces and internal warehouse. There is an ongoing project to relocate and set up CNC machines inside the plant.

The nearest village, Huangdai Village, Xiangcheng Township, Suzhou City, Jiangsu, China, is located 1 km from the Entity. Key external Stakeholders include customers such as BMW, Tesla, GM, Renault Nissan, Ford, Geely/Volvo, Stellantis, BAIC, FISKER, and Vinfast, as well as suppliers, Local Communities, and government/regulatory 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	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established systems to maintain awareness of, and to ensure Compliance with Applicable Law as well as seeking to understand and conform to relevant aspects of Customary Law.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international Standards. The Entity has issued a documented procedure of Extortion and Bribery, has provided annual training for employees on the Code of Conduct, and required all employees to sign off on the Anti-Corruption obligation.
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued a Code of Conduct and published it on its official website at: https://www.aludyne.com/contact/suzhou-china</p> <p>This Code of Conduct included principles relevant to environmental, social and governance performance. The Entity reviews the Code of Conduct at least every five years, and when any changes to the Business that alter Material environmental, social and governance risk(s), and on any indication of a control gap.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established integrated Policies consistent with environmental, social and governance practices: https://www.aludyne.com/contact/suzhou-china</p> <p>The Policies have been approved by the CEO of Aludyne Group and are reviewed at least every five years or when any changes to the Business that alter Material environmental, social and governance risks, and/or on any indication of a control gap.</p>
2.2a-c Leadership	Conformance	<p>A senior manager has been nominated as the Management Representative to lead a cross-functional team to implement the integrated Policies consistent with environmental, social and governance practices.</p> <p>The cross-functional team represents all departments. The Entity has provided ASI related training to all team members who are responsible for establishing, implementing, maintaining and improving the Management System.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an integrated Environmental Management System (EMS). The Entity has obtained Certification of its EMS to ISO 14001:2015.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented integrated a Social Management System.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy that addresses environmental, social and governance issues: https://www.aludyne.com/contact/suzhou-china</p>

CRITERION	RATING	COMMENT
		The Responsible Sourcing Policy is reviewed at least every five years, including any changes to the Business that alter Material risks and any indication of a control gap.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are currently no New Projects or Major Changes planned or under construction. However, the Entity conducted an Environmental and Social Impact Assessment in 2019 and 2021 by a qualified supplier which is disclosed on the local environmental authority's official website.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are currently no New Projects or Major Changes planned or under construction. However, the Entity conducted an Environmental and Social Impact Assessment in 2019 and 2021 by a qualified supplier which is disclosed on the local environmental authority's official website.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan for production safety accidents and an Emergency Response Plan for environmental emergencies. The emergency plans have been submitted to the local authorities for registration and are available at: https://www.aludyne.com/contact/suzhou-china Drills based on the scenarios in the Emergency plans were undertaken in 2024.
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Business Resilience Plan is reviewed annually.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the procedure of Mergers and Acquisitions to review environmental, social and governance practices in accordance with Due Diligence processes for mergers and acquisitions. No mergers and acquisitions have taken place.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established the procedure of closure, decommissioning and divestment to review environmental, social and governance practices in accordance with Due Diligence processes for closure, decommissioning and divestment should be reviewed. Closure, decommissioning and divestment activities are not currently planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Responsibility Report is publicly disclosed: https://www.aludyne.com/contact/suzhou-china The Sustainability Report covers the Entity's governance approach to environmental, social and economic impacts and its Material environmental, social and economic impacts.
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly disclosed information on the Sustainability Report on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There were no Material fines, judgments, penalties or non-monetary sanctions for failure to comply

CRITERION	RATING	COMMENT
		with Applicable Law issued for 2023, as disclosed in the Sustainability Report, page 38: https://www.aludyne.com/contact/suzhou-china
3.3a-c Payments to Governments	Conformance	The Entity has not made any payments to governments, including to political parties, except for the payment of taxes and employees' social security payments to the government in accordance with Applicable Laws and regulations. This has been disclosed in the Responsibility Report, page 38: https://www.aludyne.com/contact/suzhou-china
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a documented procedure for Stakeholder complaints and appeals, and implemented an information Management System to manage the complaint resolution mechanism. The Entity has developed an anonymous system (NAVEX) for lodging complaints, and anyone can report any complaint through the hotline at 400-120-4708 or at: aludynemobile.ethicspoint.com . More information is available at: https://www.aludyne.com/about-us/compliance Further information on NAVEX is included in the Sustainability Report, page 38: https://www.aludyne.com/contact/suzhou-china
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared the Life Cycle Assessment report for the knuckle production process. (Using Gabi software and the CML 2001 method developed by the Institute for Environmental Sciences (CML) of the University of Leiden.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has demonstrated it can provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium Products, if requested by customers. The LCA report included public access to the LCA information and its underlying assumptions, including system boundaries.
4.2 Product Design	Conformance	The Entity has set objectives in the design and development process for products to achieve the use of 80% Aluminium material for secondary raw material by 2027.
4.3a-b Aluminium Process Scrap	Conformance	As per the Entity's requirement, all Scrap is re-melted. The Aluminium Process Scrap includes Scrap generated from production, gate, reflash and saw chips. The 2023 Materials Use Report demonstrated that 27% of melting materials were Scrap. Based on the above process, all Scrap would be input into the melting process. The Aluminium alloys did not need to be separated and sorted for re-melting. All Scrap with non-conforming products was re-melted together.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has implemented a recycling strategy to recycle process waste and machined Aluminium chips, cooperation with qualified Aluminium ingot recycling suppliers and increase the percentage of recycled content for products. However, the latest version of the recycling strategy has not been publicly disclosed.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with suppliers to provide Recycled Aluminium ingots to support increased recycling rates within their market. Two suppliers who supply Recycled Aluminium ingots are approved suppliers according to the Entity's Responsible Sourcing requirements whilst the other two suppliers that provide Recycled Aluminium ingots are under review.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has accounted for and disclosed Material energy consumption and Greenhouse Gas (GHG) Scopes 1-3 emissions by source in accordance with ISO 14060, which has been verified by a third party. The GHG Verification Statement Number CN24/00001104. Energy consumption is disclosed in the 2024 Responsibility Report, page 16: https://www.aludyne.com/contact/suzhou-china
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	Minor Non-Conformance	The Entity has taken or plans to take action to address the GHG Emissions Reduction Plan. However, the GHG Emissions Reduction Pathway includes an Intermediate Target that has not been disclosed.
5.4 GHG Emissions Management	Conformance	The Entity has established a procedure for GHG Emissions Management to achieve performance aligned with the GHG Emissions Reduction plan and targets. This includes GHG Emissions Management and also defines GHG data collected methods, timing and scope.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has quantified and publicly disclosed Material Emissions to Air for 2023: https://www.aludyne.com/contact/suzhou-china The Entity has installed and maintains exhaust gas treatment equipment to reduce Emissions to Air. This plan will be reviewed when there is an emission event that exceeds internal or externally mandated limits, any changes to the business and annually.
6.2a-g Discharges to Waters	Conformance	The Entity has quantified and publicly disclosed Material Discharges to Water for 2023: https://www.aludyne.com/contact/suzhou-china The Entity has domestic sewage and industrial wastewater discharges. Domestic sewage was discharged to the municipal sewer network with a permit, and industrial wastewater was recycled after treatment. Domestic sewage discharged to the municipal sewer network is tested annually by a qualified laboratory. The plans to reduce the exposure and impact of the Discharges to Water are

CRITERION	RATING	COMMENT
		reviewed annually, and when there any changes to the business, or any indication of a control gap.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has identified the risk of Spills and Leakages as chemical Spills and Leakages. The Entity has established an Emergency Response Plan to deal with chemical Spills and Leakages. This Emergency Response Plan would be reviewed every three years and after each Spill or Leakage event, and after any changes to the business that alter the Spills and Leakages. The Emergency Response Plan is available at: https://www.aludyne.com/contact/suzhou-china
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity would disclose the details of Material Spills and Leakages to the affected people and organisations as soon as possible after an incident. To date, no Spills and Leakage incidents have been reported as disclosed in the Sustainability Report, page 38: https://www.aludyne.com/contact/suzhou-china
6.5a-c Waste Management and Reporting	Conformance	The Entity has quantified and publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated by the Entity from its activities in the Sustainability Report, page 16: https://www.aludyne.com/contact/suzhou-china Hazardous wastes are transferred to licensed Hazardous Waste disposers in accordance with local laws. Non-Hazardous Waste is collected and some waste, such as waste packaging is recycled, and the Entity has implemented a waste reduction plan.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 stores Dross at the Hazardous Waste warehouse, and an action plan has been developed to prevent the release of Dross and leachate to the environment. The Entity has maximised the recovery of Aluminium through the treatment of Dross. The treated Dross is transferred to qualified hazardous disposers.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The Entity has publicly disclosed its water withdrawal and use by source and type. The Entity does not use groundwater as this is prohibited, but source water from the municipal supply. The Entity has undertaken a water assessment and the quantities relating to its water consumption. However, it was identified the Water Resource Risk Assessment Report presented incorrect quantities of water consumption for 2023.
7.2a-e Water Management	Conformance	The Entity has implemented water management plans, which include the following actions, the monthly monitoring of water consumption and quarterly monitoring of domestic sewage water quality. The latest version of the management plans (Domestic Wastewater Management Plan) is available at: https://www.aludyne.com/contact/suzhou-china

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located within an industrial park planned by the local Government. The Environmental Impact Assessment Report confirmed that there are no Protected Areas for biodiversity and ecosystems, and the risk and potential impacts on biodiversity and Ecosystem Services are low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there are no biodiversity and Ecosystem Services and no Material risks, and the impacts have been assessed as low in the Environmental Impact Assessment Report.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no biodiversity and Ecosystem Services and no Material risks, and the impacts have been assessed as low in the Environmental Impact Assessment Report.
8.3a-c Management of Priority Ecosystem Services	Conformance	This Criterion is not applicable to the Entity, as there are no biodiversity and Ecosystem Services and no Material risks, and the impacts have been assessed as low in the Environmental Impact Assessment Report.
8.4 Alien Species	Conformance	The Entity does not deliberately introduce Alien Species and the risk of accidental introduction of Alien Species is low. All imported goods and packaging are fumigated by customs department.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to "No Go" in World Heritage Properties. The Environmental Impact Assessment Report showed there are no World Heritage Properties in or near to the industrial park where the Entity is located.
8.6a-d Protected Areas	Conformance	The Entity is located within an industrial park planned by the local government. According to the Environmental Impact Assessment Report, there are no natural Protected Areas within its Area of Influence.
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	Minor Non-Conformance	<p>The Entity has established a Social Policy that addresses Human Rights (Aludyne ESG Policy): https://www.aludyne.com/contact/suzhou-china</p> <p>The Entity's Code of Conduct includes a Gender-Responsive Policy and a commitment to respect Human Rights. The Entity has established a checklist for Human Rights Due Diligence, however the Entity has not used this checklist to conduct its Human Rights Due Diligence.</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has implemented a program that promotes gender equity and women's empowerment. The Entity will review the program every five years at least, or when there are any changes to the business, or any indication of a control gap.</p> <p>However, it was identified that the Entity has not publicly reported on the effectiveness of measures taken to promote gender equality on an annually. There is very little information in the Sustainability Report on the effectiveness of the measures taken to promote gender equality.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity as it located at the industrial park planned by the local Government. The Environmental Impact Assessment report confirmed there were no cultural and sacred heritage sites within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity as it is located within an industrial park planned by the local Government. The Environmental Impact Assessment report confirmed there were no cultural and sacred heritage sites within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it located within the industrial park planned by the local Government and did not cause any displacements.
9.7a-h Affected Populations and Organisations	Conformance	<p>This Criterion is not applicable to the Entity, as they are located within the Cahu Industrial Park planned by the local government and the risk of impact to local residential areas is limited.</p> <p>The nearest is Yulian New Village, approximately one kilometre from the Entity. The Entity interviewed five families in 2023 where no negative feedback has been received and the risk of impact to residents is limited.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Management System that includes the Supply Chain Policy, assigned responsibilities and resources, information gathering and supplier engagement activities.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has identified all their suppliers, and all its suppliers are in China. No suppliers are located at Conflict-Affected and High-Risk Areas (CAHRAs), and it has determined the supply chain risks are low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable as the Entity has reviewed supplier information, and with all suppliers located within China, none are located within conflict and high-risk areas. The risk of the supply chain is therefore low.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported annually on supply chain Due Diligence on 2024 Year Responsibility Report, pages 33-36: https://www.aludyne.com/contact/suzhou-china
9.9 Security practice	Conformance	The Entity respects Human Rights in its involvement with private security providers as recognised standards and good practice. The contract signed with security providers showed that there are three unarmed gatekeepers providing security services. The contract has prescribed that the Gatekeeper's duty is to guard the gate and patrol at night. Gatekeepers have no right to restrict the freedom of Workers, and this was also confirmed through Worker interviews.
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 Chinese Applicable Law (e.g. Labour Unions are Government controlled and not independent).
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Minor Non-Conformance	<p>The Entity did not ensure Workers were free to form or join Labour Unions or other associations to collectively bargain within the bounds of Applicable Law. It was found that all Workers joined trade unions when they joined the Entity, but there is no evidence that this was the Workers' choice.</p> <p>According to the Trade Union Law of the People's Republic of China, it is the right and obligation of Labour Unions to represent employees in equal negotiations with enterprises and to sign collective agreements in accordance with the law. There was no evidence available that the Labour Union had signed collective agreements with the Entity.</p>
10.2a Child Labour	Conformance	The Entity only hires Workers who are 16 years of age or older. The Human Resources Department verifies employees' IDs before hiring them. During the Audit, it was confirmed that there were no Workers under the age of 16, and the youngest employee is 19 years old. This complies with Chinese law, which stipulates that all Workers must be over 16 years old.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity does not engage in, nor supports the use of Forced Labour or Human Trafficking. They do not require any form of deposit, Recruitment Fee, Costs and Charges or equipment advance from

CRITERION	RATING	COMMENT
		<p>Workers either directly or through employment or recruitment agencies.</p> <p>The Entity has publicly disclosed the statement on Anti-Modern Slavery and Anti-Human Trafficking (https://www.aludyne.com/contact/suzhou-china), however the Entity has not disclosed a 'stand-alone' Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities and does not engage in, nor supports Discrimination in hiring, salary, promotion, training, advancement opportunities and termination of any Worker based on gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. The Entity sets key performance indicators for everyone and performs appraisals of positions based on the key performance indicators at the end of the year.</p> <p>A review of job advertisements only describes responsibilities, education, ability, and work experience and has no other restrictions. KPIs evaluation records indicate there is no presence of Discrimination in terms of hiring, salary, promotion, training, or advancement opportunities.</p> <p>The Entity has issued the Code of Conduct and Employee Handbook to all employees, which includes the 'No Harassment and Non-Discrimination Policy'. Every employee is trained on the Code of Conduct and Employee Handbook.</p> <p>The Entity has also publicised the hotline and installed a letter box in the canteen, where any employee can report the issue to the Unit where they feel discriminated against or harassed.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established many channels to ensure communication and engagement, including ways to report anonymously.</p> <p>Workers and Workers' representatives can communicate with management via a hotline, and email and can submit problems through the mailbox. Workers can communicate directly with the General Manager and their managers at employee meetings.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented a Social Management Manual which covers Violence and Harassment, available at: https://www.aludyne.com/contact/suzhou-china</p> <p>It is reviewed at least every five years, on any changes to the Business that alter Material risk(s) of Violence and Harassment, and on any indication of a control gap. Employees could give feedback on any issues or suggestions related to Violence and Harassment and training is provided.</p>
10.7a-c Remuneration	Conformance	<p>The Entity signs employment contracts with each Worker, which includes the conditions of employment in Chinese and in a format they understand. The legal minimum standard wage is 2,450 RMB/Month, and the basic wage is 2,650 RMB/Month. This includes Overtime pay, allowance and welfare, pay which is over 5,000 RMB/Month.</p> <p>The employment contract defines that Overtime pay is 150% of the basic wage, weekend pay is 200% of the basic wage, and 300% of the</p>

CRITERION	RATING	COMMENT
		basic wage on a national holiday. Wages are paid directly into the bank account of Workers before the 25 th of each month.
10.8a-c Working Time	Conformance	The Entity complies with Chinese Applicable Law and industry standards on working hours (including Overtime), public holidays and paid annual leave. This includes ensuring that employees have at least one day off per seven-day period on average and that the working day does not exceed 8 hours on average over six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides the employee handbook to inform Workers of their rights, and Workers interviewed confirm that they are aware of their rights at work.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity utilises a third-party global reporting system to allow for streamlined communications and response to all safety incidents, near misses, and hazards. Monthly calls are held with the facilities and leadership to address safety incidents and share best practices. The effectiveness of the OH&S Management System was reported on the 2024 Responsibility Report, pages 13, 20-25: https://www.aludyne.com/contact/suzhou-china</p> <p>However, the Entity has not disclosed a comparative analysis of performance with peer Businesses and leading practices.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a mechanism that Workers could raise, discuss and participate in the resolution of OH&S issues with management according to ISO 45001 requirements.</p> <p>For example, Workers or Workers' representatives can communicate with management about health and safety issues via e-mail, the suggestion box or by talking directly to the general manager.</p> <p>Workers' representatives are involved in the risk identification process. The issues concerning the working environment or other Workers were registered and corrective actions implemented and resolved.</p>

ASI LIMITATION OF LIABILITY DISCLAIMER

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 November 2024	Initial Certification Audit – Full Certification
