# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## Maxop Engineering Co. Pvt. Ltd.

CERTIFICATE NUMBER

449

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

6 MARCH 2025

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

31 MAY 2027

ASI ACCREDITED AUDITING FIRM

**CETIZION VERIFICA** 

**CERTIFIED SINCE** 

6 MARCH 2025

**AUTHORISED BY** 

The

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**

Re-melting of post-consumer Aluminium Scrap, high-pressure die casting, and machining of Aluminium die-casted parts at Maxop Engineering Co. Pvt. Ltd., Unit-VII located in Manesar, India.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

MEMBER NAME	Maxop Engineering Co. Pvt. Ltd.		
ENTITY NAME	Maxop Engineering Co. Pvt. Ltd.		
CERTIFICATION SCOPE	Re-melting of post-consumer Aluminium Scrap, high-pressure die casting, and machining of Aluminium die-casted parts at Maxop Engineering Co. Pvt. Ltd., Unit-VII located in Manesar, India.		
SUPPLY CHAIN ACTIVITIES	Material Conversion – Principles 1 to 4 (transition)		
ASI STANDARD	Performance Standard V3		
AUDIT TYPE	Initial Certification Audit		
AUDIT FIRM	CETIZION Verifica		
AUDIT DATE	• 26 - 27 December 2024		
AUDIT REPORT SUBMISSION	• 10 February 2025		
AUDIT SCOPE	The Audit Scope included the re-melting of post-consumer Aluminium Scrap, high-pressure die casting, and machining of Aluminium die-casted parts at Maxop Engineering Co. Pvt. Ltd., Unit-VII located in Manesar, India.		
	Supply chain activities included in the Audit Scope:		
	Material Conversion – Principles 1 to 4 (transition)		
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope.		
AUDIT OUTCOME	Certification		
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:		
DECLARATION	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	6 March 2025 - 31 May 2027		

NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	6 March 2026
CERTIFICATE NUMBER	449



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

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**

Maxop Engineering Co. Ltd., Unit-VII is located at Plot 30A-1 & 30A-2 Sector-2A, IMT Manesar, Haryana-122050, approximately 30 kilometres (km) from New Delhi International Airport and well connected by road, rail, and air. It is a part of the Maxop Engineering Group, one of the major automotive component suppliers to automotive equipment manufacturers (OEMs) and Tier-1 customers within both India and globally. Unit VII is engaged in the manufacture and export of casted and machined auto components.

Molten Aluminium used in the production process is sourced from another Maxop unit that has a re-melting furnace, where Aluminium is recycled from Scrap material. Annually, the Unit produces approximately 950 tonnes of Aluminium casting as saleable products. These die-cast automotive parts are primarily directed towards direct retailing, both in the domestic market and for export. With a workforce of approximately 350 employees and contractors, Unit VII is an important manufacturer for the production and distribution of these components.

For more details refer to: <a href="https://maxop.com">https://maxop.com</a>

#### **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	Low	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL		MED	IUM	

### **FINDINGS**

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non- Conformance	The Entity has implemented a legal process that defines overall legal responsibility with Corporate Human Resources, whilst at the unit level, Human Resources has overall responsibility. The organisation chart illustrates a clear reporting line between the unit level and the corporate functions. The procedure requires the review of the effectiveness of compliance and its frequency, as part of the performance review at the plant level and management review meetings.
		However, legal requirements are not adequately identified and monitored (e.g. availability of occupational health centre, medical examination of employees working in hazardous processes (melting, casting, buffing, blasting, etc.) every six months as required by its own procedure.
		The legal compliance requirements of the recently added adjacent production site are also not fully met (e.g. environmental permit, etc., the start of commercial production in July 2024).
		In addition, the conditions of the legal permits are not effectively monitored and the annual self-declaration on fire-fighting equipment was not available.
1.2 Anti-Corruption	Conformance	The Entity has established Anti-Bribery and Anti-Trust Policy, which is publicly available at:  https://www.maxop.com/docs/policies/MECPL_Anti_Bribery%20_Anti_Trust_Policy%20.pdf
		An anti-Bribery risk assessment was conducted as part of the 'Register-Ethical Risk' and was last updated in November 2024.  Training is provided during induction and refresher training is also provided.
1.3a-e Code of Conduct	Conformance	The Entity has developed an Employee Code of Conduct, which is publicly available at:  https://www.maxop.com/docs/policies/MECPL_Code_of_Conduct_&_Ethics_Policy%20.pdf
		The Code of Conduct training is included in the induction process and refresher training, and records are maintained. The Employee Code of Conduct is issued to employees, and an acknowledgement copy is available in employment records.
2. POLICY AND MANAGEMEN	ІТ	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed various Policies addressing Environment, Social and Governance (ESG). The Sustainability Policy (Governance, Social) is available at:  https://www.maxop.com/docs/policies/MECPL_Sustainability_Policy.pdf
		The Entity has developed a Corporate Social Responsibility Policy, as mandated by the <i>Indian Companies Act</i> , available at: https://www.maxop.com/docs/policies/Maxop%20-%20CSR%20Policy.pdf

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity's senior management has endorsed ESG-related Policies, provided resources and communicated its commitment to sustainability. The Assistant General Manager-ESG has overall responsibility for ESG matters in terms of driving, coordinating and reporting to management. ESG performance and KPIs are reviewed monthly with the senior management team. The latest review was undertaken in December 2024.  https://www.maxop.com/sustainability
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an ISO 14001:2015 certified Environmental Management System at the corporate level covering all manufacturing units, including the integrated management system policies, manuals and procedures. The third-party letter of recommendation confirms the successful certification against the ISO 14001:2015 and ISO 45001:2018 standards.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Social Management System at the corporate level, covering all manufacturing units through social Policies and procedures. The Health and Safety Management System has been established and recently audited according to ISO 45001:2018. The third-party letter of recommendation confirms the successful certification against the ISO 45001:2018 standard. Periodic reviews of social management systems/practices are conducted, and records of the meetings are maintained.  Some of these social Policies are publicly available at:
		https://www.maxop.com/sustainability
2.4a-e Responsible Sourcing	Minor Non- Conformance	The Entity has established a Supplier Code of Conduct and in addition, there is dedicated Policy for responsible sourcing of raw material. The supplier acknowledgement of the Entity's Responsible Sourcing Policy and other terms and conditions are available. The ESG training has been provided to key suppliers, following a structured presentation explaining the responsible sourcing Policy and the actions required. The implementation of responsible sourcing requirements is being checked as part of the supplier quality audit, an annual plan developed covering April to March of every financial year.
		However, the Entity has not publicly disclosed its Responsible Sourcing Policy.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.  However, the Entity has conducted Environmental and Social Impact Assessment as part of an integrated Management System, and the risk register was reviewed during the Audit, which identifies risks, impacts, treatment measures and controls, and monitoring status.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.  However, the Entity has developed a procedure for Human Rights Due Diligence and Impact Assessment explaining detailed methodologies and processes, assessing actual and potential Human Rights impacts etc. The checklist covers areas relevant to human rights like land and property which are assessed, and follow-up actions are initiated wherever required.

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Minor Non- Conformance	The Entity has developed an on-site Emergency Response Plan. Emergency scenarios have been identified, and each emergency scenario has been described in detail in terms of responsibilities, step-by-step responses or required actions. The Emergency Response Team (ERT) has been designated with specific roles including fire marshal, first aid and evacuation. The ERT members have been trained.  The Emergency Response Plan is accessible to Stakeholders upon request.  However, the on-site Emergency Response Plan does not address adjoining plot number 30B, which commenced manufacturing operations in July 2024. Molten metal-related emergencies such as explosions and Spills are also not adequately covered in the Emergency Response Plan.
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan, which was last reviewed and updated in September 2024. The Plan considers possible situations where operations have to be suspended due to interruptions and/or disruptions, as well as control measures that take into account environmental, social and governance aspects.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Consolidation, Mergers and Acquisitions Policy, which provides guidelines for the consideration of environmental, social and governance issues in mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a Policy and procedure for a closure, decommissioning and divestment plan that addresses environmental, social and governance issues.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non- Conformance	The Entity has conducted a materiality assessment following the PESTLE (Political, Economic, Social, Technological, Legal and Environmental) methodology. The Entity is in the process of developing its sustainability reporting process and has not publicly disclosed at the time of the Audit its Sustainability Report covering information on its governance approach to environmental, social, and economic impacts and its Material environmental, social, and economic impacts related to ASI Performance Standard principles.
3.2 Non-compliance and Liabilities	Conformance	Human Resources has the overall responsibility for receiving and managing any cases of non-compliance and liabilities. The Entity has maintained a statutory register for 'Government Inspection'. The statutory reporting is accessible to the public or interested parties upon request.  There are no Material fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law since they joined ASI as a member in February 2024. Any disclosures of non-compliance and liabilities will be included in the Sustainability Report.
3.3a-c Payments to Governments	Conformance	The Entity makes payments to Government authorities for statutory taxes such as corporate tax and social security in Indian currency,

CRITERION	RATING	COMMENT
		some of which were reviewed during the Audit, such as social security payments (e.g. provident fund and employees' state insurance).
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed a complaint handling system for internal and external Stakeholders. The Human Resources Department is responsible for the overall r investigation process. There is a practice of interacting with employees, both permanent and contractors, every Saturday at a pre-determined time. Any feedback or grievances are recorded in the register and taken up for action. There is a grievance committee comprising of both management and Worker representatives, both male and female, which meets monthly, and meetings minutes are maintained.  The Entity has maintained the register for communication with external Stakeholders, there are currently no complaints or requests for information from external Stakeholders. There is a Vigil Mechanism for internal and external Stakeholder complaints, which details the process for reporting and handling complaints with contact details, available at:  https://www.maxop.com/docs/policies/Vigil_Mechanism_Policy.pdf https://www.maxop.com/docs/policies/MECPL_Grievance_Redressal_Mechanism.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non- Conformance	The Entity has conducted a Life Cycle Assessment (LCA) to address all manufacturing units, using consumption data and relevant emission factors. However, there is no documented procedure with methodologies for identifying major Product lines, performing life cycle impacts, inclusion and exclusion, and alignment with applicable standards ISO 14040 and ISO 14044.  The existing LCA sheet also does not address certain inputs such as packaging and impact categories according to the LCA methodology, and there is currently no documented LCA Report for major Product lines.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non- Conformance	The Entity has committed to share LCA results with customers upon request, however no such requests have yet been received.  The LCAs are made available to stakeholders but do not include
		information on the underlying assumptions, including system boundaries.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as they are not involved in the product design process as the Entity's customers determine this information.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects all its process Scrap and segregates according to grade and uses 100% of the Scrap for reuse/re-melting in the casting of new products. This was verified during the plant visit and through discussions with production and other responsible employees.
4.4a-c Collection and Recycling of Products at End of Life - Material	Minor Non- Conformance	The Entity collects aluminium metal scrap from domestic as well as international suppliers. However, there is no documented and public disclosure on recycling strategy including specific timelines, activities, and targets.

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity works with industry associations and organisations to support recycling systems and efforts to increase recycling rates in India, including membership of the Material Recycling Association of India (MRAI ( <a href="https://mrai.org.in">https://mrai.org.in</a> ) and participation in related exhibitions (e.g. Aluminium Caster Association (Alucast)) ( <a href="https://www.alucast.co.in/index.html">https://www.alucast.co.in/index.html</a> ).
5. GREENHOUSE GAS EMISSI	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.4 GHG Emissions Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.2a-g Discharges to Waters	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.3a-g Assessment and Management of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.5a-c Waste Management and Reporting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4 Alien Species	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.2a-e Gender Equity and Women's Empowerment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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's Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.2a Child Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3a-c Forced Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.4a-c Non-Discrimination	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.5 Communication and engagement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.6a-g Violence and Harassment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.7a-c Remuneration	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.8a-c Working Time	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.9a-b Informing Workers of Rights	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2 Employee engagement on Health and Safety	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	6 March 2025	Initial Certification Audit – Full Certification; Certification Expiry set for 31 May 2027 as per ASI Assurance Manual requirement for all Entities to be certified to the PS (P1-11) without exception by this date.
1	14 March 2025	Correction to the Certification logo on Certificate page 1