## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# HENAN ZHONGFU HIGH PRECISION ALUMINIUM PRODUCTS CO., LTD

CERTIFICATE NUMBER 123 ASI STANDARD PERFORMANCE STANDARD (V2 2017)

DATE OF ISSUE

DATE OF EXPIRY

CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR

SGS-CSTC STANDARDS TECHNICAL SERVICES

CERTIFIED SINCE 1 APRIL 2021

AUTHORISED BY

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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

A high end aluminium product manufacturer including casting, hot rolling, cold rolling, finishing and packaging process, which is located in Yulian Industrial Park, Zhanjie Town, Gongyi City, Henan Province, China.

## SUMMARY AUDIT REPORT PERFORMANCE STANDARD

### OVERVIEW

| MEMBER NAME                | Henan Zhongfu High Precision Aluminium Products Co., Ltd   |
|----------------------------|--|
| ENTITY NAME                | Henan Zhongfu High Precision Aluminium Products Co., Ltd   |
| CERTIFICATION<br>SCOPE     | A high end aluminium product manufacturer including casting, hot rolling, cold rolling, finishing and packaging process, which is located in Yulian Industrial Park, Zhanjie Town, Gongyi City, Henan Province, China. |
| SUPPLY CHAIN<br>ACTIVITIES | <ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion (Production and Transformation)</li> </ul>   |
| ASI STANDARD               | Performance Standard V2  |
| AUDIT TYPE                 | Certification Audit  |
| AUDIT FIRM                 | SGS-CSTC Standards Technical Services  |
| AUDIT DATE                 | • 21 – 23 January 2021   |
| AUDIT REPORT<br>SUBMISSION | 26 February 2021   |
| AUDIT SCOPE                | The audit scope included the manufacturing of aluminium products at the Henan Zhongfu High Precision Aluminium Products facility, located in Gongyi City, Henan Province, China.                                       |
|                            | Supply chain activities included in the Audit Scope:   |
|                            | <ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion (Production and Transformation)</li> </ul>   |
|                            | All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.  |

| AUDIT<br>METHODOLOGY<br>DECLARATION | The Auditors confirm that:  |  |  |  |  |
|-------------------------------------|---|--|--|--|--|
|                                     | <ul> <li>The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li>The findings are based on verified Objective Evidence relevant to the</li> </ul> |  |  |  |  |
|                                     | time period for the Audit, traceable and unambiguous.   |  |  |  |  |
|                                     | The Audit Scope and audit methodology are sufficient to establish<br>confidence that the findings are indicative of the performance of the<br>Entity's defined Certification Scope.   |  |  |  |  |
|                                     | The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.   |  |  |  |  |
| CERTIFICATION<br>PERIOD             | 1 April 2021 – 31 March 2024  |  |  |  |  |
| NEXT AUDIT<br>TYPE                  | Surveillance Audit  |  |  |  |  |
| NEXT AUDIT<br>DUE DATE              | 31 March 2022   |  |  |  |  |
| CERTIFICATE<br>NUMBER               | 123   |  |  |  |  |

## SUMMARY OF FINDINGS

| CRITERION  | RATING      | COMMENT  |  |
|--|-------------|--|--|
| PRINCIPLE 1 BUSINESS INTEGRITY   |             |  |  |
| 1.1 Legal Compliance   | Conformance | The Entity has established a management system to maintain awareness of and ensure compliance with Applicable Law.   |  |
| 1.2 Anti-Corruption  | Conformance | <ul> <li>The Entity has established the following corrective actions to against corruption:</li> <li>1. All middle and senior managers are evaluated each year, including corruption requirements.</li> <li>2. The Entity has established a corruption reporting hotline (0571-64569009).</li> <li>3. General manager communications.</li> </ul> |  |
| 1.3 Code of Conduct  | Conformance | The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance.  |  |
| PRINCIPLE 2 POLICY & MANAC   | GEMENT      |  |  |
| 2.1a Environmental, Social, and<br>Governance Policy (implement and<br>maintain) | Conformance | The Environmental, Social, and Governance (ESG)<br>policy has established and implemented.<br>The Entity has maintained the documented<br>information about policies, which addresses<br>environmental, EHS, ASI performance and energy.   |  |
| 2.1b Environmental, Social, and<br>Governance Policy (senior<br>management)      | Conformance | The General Manager has approved each of the Policies and has offered support for each.  |  |
| 2.1c Environmental, Social, and<br>Governance Policy<br>(communication)          | Conformance | The Environmental, Social, and Governance<br>documented policy was issued in the management<br>system. It is published at:<br>http://www.zfsy.com.cn/uploadFiles/files/2021012508<br>0001.pdf  |  |
| 2.2 Leadership   | Conformance | The Entity has nominated a senior management<br>representative as having overall responsibility and<br>authority for ensuring conformance with the<br>requirements of this Standard.   |  |
| 2.3a Environmental and Social<br>Management Systems<br>(environmental)           | Conformance | The Entity has developed and implemented an integrated management system.<br>The Entity has obtained ISO 14001:2015 certificate.   |  |
| 2.3b Environmental and Social<br>Management Systems (social)                     | Conformance | The Entity has developed and implement an integrated management system.<br>For example, the Entity has obtained the ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 certificate.   |  |

| CRITERION                                   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | A documented social management system is also maintained.   |
| 2.4 Responsible Sourcing                    | Conformance | The Entity has implemented a responsible sourcing<br>Policy covering environmental, social and<br>governance issues.<br>The documented policy can be found as below:<br>http://www.zfsy.com.cn/uploadFiles/files/2021012508<br>0001.pdf   |
| 2.5 Impact Assessments                      | Conformance | The Entity conducted environmental, social, cultural<br>and Human Rights Impact Assessments, including a<br>gender analysis, for new projects or major changes<br>to existing facilities as local laws requirements.<br>Reference report: Environmental Impact Assessment<br>Report for Annual Production of 500,000 tonnes of<br>Electrolytic Aluminium Project (Issued on September<br>2019). |
| 2.6 Emergency Response Plan                 | Conformance | The Entity has developed site specific emergency response plans, and the emergency response plans were registered at the local authority.   |
| 2.7 Mergers and Acquisitions                | Conformance | The Entity has established a procedure for the review<br>of environmental, social and governance issues in<br>the Due Diligence process for mergers and<br>acquisitions. Up until now, no mergers and<br>acquisitions have occurred.  |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity has established a procedure for review<br>environmental, social and governance issues in the<br>planning process for Closure, Decommissioning and<br>Divestment. Up until now, no Closure,<br>Decommissioning and Divestment has occurred.   |
| PRINCIPLE 3 TRANSPARENCY                    |             |   |
| 3.1 Sustainability Reporting                | Conformance | The Entity has publicly disclosed its governance<br>approach and its material environmental, social and<br>economic impacts in the official website as below:<br>http://www.zfsy.com.cn/uploadFiles/files/2021012015<br>4121.pdf  |
| 3.2 Non-compliance and liabilities          | Conformance | No significant fines, judgements, penalties and non-<br>monetary sanctions for failure to comply with<br>Applicable law were happened.<br>The self-declaration is on the official website as<br>below:<br>http://www.zfsy.com.cn/uploadFiles/files/2021012015<br>3335.pdf   |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 3.3a Payments to governments (legal and contractual)                  | Conformance    | The Entity has made on its behalf, payments to Governments on a legal and/or contractual basis.  |
| 3.3b Payments to governments<br>(disclosure - bauxite mining)         | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 3.4 Stakeholder complaints, grievances and requests for information   | Conformance    | The Entity has implemented accessible, transparent,<br>understandable and culturally complaints resolution<br>mechanisms, adequate to address stakeholder<br>complaints, grievances and requests for information<br>relating to its operations.  |
| PRINCIPLE 4 MATERIAL STEW   | ARDSHIP        |  |
| 4.1a Environmental Life Cycle<br>Assessment (life cycle impacts)      | Conformance    | The environmental life cycle assessment for aluminium foil products has been conducted and documented.   |
| 4.1b Environmental Life Cycle<br>Assessment (cradle to gate)          | Conformance    | The environmental life cycle Assessment report can be provided via external communication channels as required. There have been no requests to date.   |
| 4.1c Environmental Life Cycle<br>Assessment (public<br>communication) | Conformance    | The environmental life cycle assessment report is published on the Member's official website. For more detailed information, please see: <a href="http://www.zfsy.com.cn/environment/1558.html">http://www.zfsy.com.cn/environment/1558.html</a>   |
| 4.2 Product design  | Conformance    | Following the product development process, the<br>environmental impacts are taken into consideration.<br>The Entity has established and implemented a<br>products design procedure (Q/G-05-JSZ- and has<br>established objectives in the Entity's 2020 KPI Sheet<br>for the product development process. |
| 4.3a Aluminium Process Scrap<br>(targets)                             | Conformance    | The process scrap utilization rate is 100%.  |
| 4.3b Aluminium Process Scrap<br>(alloy separation)                    | Conformance    | As per the result of risk analysis, the process scrap in the site does not need separation for recycling.  |
| 4.4a Collection and recycling of products at end-of-life (strategy)   | Conformance    | The Entity communicates with its main customer to discuss how to improve the recycling rate of products at their end of life.  |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance    | As there is no consolidated local, regional or national collection and recycling systems for aluminium scrap in China, the Entity is working with the customer to decide how to improve the recycling rate of products at end of life.   |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS                                  |                |  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| 5.1 Disclosure of GHG emissions and energy use     | Conformance    | The Entity has accounted for and publicly disclosed material GHG emissions and energy use by source on an annual basis on its official website.<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5212.pdf  |
| 5.2 GHG emissions reductions                       | Conformance    | The Entity has published time-bound GHG emissions reductions targets (to 2025 year, GHG emissions reductions to 1.1T CO2 e/t). This information can be found here:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5212.pdf   |
| 5.3a Aluminium Smelting<br>(management system)     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.3b Aluminium Smelting (up to and including 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.3c Aluminium Smelting (after 2020)               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| PRINCIPLE 6 EMISSIONS, EFF                         | LUENTS AND W   | ASTE  |
| 6.1 Emissions to Air                               | Conformance    | The Entity has quantified and reported emissions to<br>air that have adverse effects on humans or the<br>environmental, the report can be found as below:<br><u>http://www.zfsy.com.cn/uploadFiles/files/2021012218</u><br><u>1921.pdf</u><br>The Entity has installed waste gas treatment facilities<br>to minimise any adverse impacts.   |
| 6.2 Discharges to Water                            | Conformance    | The Entity has quantified and reported discharges to water that have adverse effects on humans or the environmental, the report can be found as below: <a href="http://www.zfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.zfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.zfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.zfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.zfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.sfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.sfsy.com.cn/uploadFiles/files/2021012218">http://www.zfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.sfsy.com.cn/uploadFiles/files/2021012218">http://www.sfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.sfsy.com.cn/uploadFiles/files/2021012218">http://www.sfsy.com.cn/uploadFiles/files/2021012218</a> <a href="http://www.sfsy.com.cn/uploadFiles/files/2021012218">http://www.sfsy.com.cn/uploadFiles/files/2021012218</a> <a emergency<br="" href="http://www.sfsy.com.cn/uploadFiles/files&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;6.3a Assessment and Management&lt;br&gt;of Spills and Leakage&lt;br&gt;(assessment)&lt;/td&gt;&lt;td&gt;Conformance&lt;/td&gt;&lt;td&gt;The Entity has conducted an assessment of major&lt;br&gt;risk areas of operations where spills and leakage&lt;br&gt;may contaminate air, water and/or oil. The report can&lt;br&gt;be found as below:&lt;br&gt;http://www.zfsy.com.cn/uploadFiles/files/2021010715&lt;br&gt;5232.pdf&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;6.3b Assessment and Management&lt;br&gt;of Spills and Leakage&lt;br&gt;(management)&lt;/td&gt;&lt;td&gt;Conformance&lt;/td&gt;&lt;td&gt;The Entity has established the ">Response Plan to Environmental Incident" procedure<br/>to detect and prevent these spills and Leakage.</a> |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 6.4a Reporting of Spills (immediate disclosure)         | Conformance    | The Entity will disclose to affected parties (in particular to the local authority) the volume, type and potential impact of significant spills immediately after an incident according to local laws requirements. To date, no spills have occurred. The self-declaration can be found here:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5232.pdf |
| 6.4b Reporting of Spills (regular reporting)            | Conformance    | The Entity will publicly disclose impact assessments<br>of the spills and remediation actions taken, and<br>report publicly on an annual basis. To date, no spills<br>have occurred. The self-declaration can be found<br>here:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5232.pdf   |
| 6.5a Waste management and reporting (strategy)          | Conformance    | The Entity implemented a Waste Management<br>Strategy that is designed in accordance with the<br>Waste Mitigation Hierarchy, which included the<br>hazard waste were transferred to qualified suppliers<br>to treatment and/or the reuse of some waste such as<br>wood packing materials.  |
| 6.5b Waste management and reporting (disclosure)        | Conformance    | The Entity publicly disclose the quantity of hazardous<br>and non-hazardous waste generated by the Entity,<br>and associated waste disposal methods as below:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5039.pdf   |
| 6.6a Bauxite Residue (storage construction)             | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6b Bauxite Residue (integrity checks and controls)    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6c Bauxite Residue (water discharge)                  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6d Bauxite Residue (marine and aquatic environments)  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6e Bauxite Residue (state of the art technologies)    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6f Bauxite Residue (remediation)                      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7a Spent Pot Lining (SPL)<br>(storage and management) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
| 6.7b Spent Pot Lining (SPL)<br>(recovery and recycling)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7c Spent Pot Lining (SPL)<br>(Untreated SPL)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7d Spent Pot Lining (SPL)<br>(review of alternatives)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7e Spent Pot Lining (SPL)<br>(marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.8a Dross (recovery)  | Conformance    | <ul> <li>The Entity has implemented a process to maximise the recovery of Aluminium by Dross and Dross residues.</li> <li>1. On-site verification that the Dross were transferred to single ovens to re-melting.</li> <li>2. The Dross from single ovens were sold to another plant for re-melting.</li> <li>3. The final Dross residues are transferred to a cement plant.</li> </ul> |
| 6.8b Dross (recycling)   | Conformance    | The Entity maximises the recycling of treated Dross residues, the Dross were transferred to single ovens to re-melting. Then the Dross from single ovens were sold to other plant to re-melting.   |
| 6.8c Dross (review of alternatives)                              | Conformance    | The final Dross residues are transferred to a cement plant.  |
| PRINCIPLE 7 WATER STEWARD  | DSHIP          |  |
| 7.1a Water assessment (mapping)                                  | Conformance    | The Entity has determined that the water source is<br>supplied by the municipal water supply company,<br>from the Huanhe River.<br>The Entity has mapped the water use in the water<br>balance report.   |
| 7.1b Water assessment (risk<br>assessment)                       | Conformance    | The Entity has assessed water-related risks in watersheds in the Entity's Area of Influence. The report could be found as below. The report can be found as below:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5138.pdf  |
| 7.2a Water management<br>(management plans)                      | Conformance    | The Entity has publicised the information of water<br>withdrawal and use and disclose material water-<br>related risks in its official website:<br><u>http://www.zfsy.com.cn/uploadFiles/files/2021010715</u><br>5138.pdf  |

| CRITERION  | RATING      | COMMENT  |
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|  |             | Although the water-related risks are low, the Entity<br>has monitored the water quality each year. Test<br>results of waste water are presented here:<br><u>http://www.zfsy.com.cn/uploadFiles/files/2021012218</u><br><u>1921.pdf</u>   |
| 7.2b Water management<br>(monitoring)                                      | Conformance | The Entity has publicised the information of water<br>withdrawal and use and disclose material water-<br>related risks in its official website:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5138.pdf<br>Although the water-related risks are low, the Entity<br>has monitored the water quality each year. Test<br>results of waste water are presented here:<br>http://www.zfsy.com.cn/uploadFiles/files/2021012218<br>1921.pdf                                       |
| 7.3 Disclosure of water usage and risks                                    | Conformance | The Entity has publicised the information of water<br>withdrawal and use and disclose material water-<br>related risks in its official website:<br>http://www.zfsy.com.cn/uploadFiles/files/2021010715<br>5138.pdf   |
| PRINCIPLE 8 BIODIVERSITY   |             |  |
| 8.1 Biodiversity assessment  | Conformance | The Entity has assessed the risk and materiality of<br>the impacts on biodiversity from the land use and<br>activities in the Entity's Area of influence. The<br>evaluation result showed the risk as low.   |
| 8.2a Biodiversity management<br>(biodiversity action plans)                | Conformance | The current environmental impact evaluation report<br>issued by "Shangxi Qingzhe Yangguan<br>Environmental Protect Co.,Ltd." showed that the<br>Entity is located in the Yulian Industrial Park, Zhanjie<br>Town, Gongyi City, Henan Province, P.R. China.<br>This area was developed by the Local Government,<br>and it was not located in the farmland, constructive<br>expansion restricted zone and constructive<br>expansion prohibited zone (ecological preservation<br>area). |
| 8.2b Biodiversity management<br>(consultation and mitigation<br>hierarchy) | Conformance | The current environmental impact evaluation report<br>issued by "Shangxi Qingzhe Yangguan<br>Environmental Protect Co.,Ltd." showed that the<br>Entity is located in the Yulian Industrial Park, Zhanjie<br>Town, Gongyi City, Henan Province, P.R. China.<br>This area was developed by the Local Government,<br>and it was not located in the farmland, constructive<br>expansion restricted zone and constructive<br>expansion prohibited zone (ecological preservation<br>area). |

| CRITERION   | RATING                    | COMMENT  |
|---|---------------------------|--|
| 8.2c Biodiversity management<br>(reporting)   | Conformance               | The current environmental impact evaluation report<br>issued by "Shangxi Qingzhe Yangguan<br>Environmental Protect Co.,Ltd." showed that the<br>Entity is located in the Yulian Industrial Park, Zhanjie<br>Town, Gongyi City, Henan Province, P.R. China.<br>This area was developed by the Local Government,<br>and it was not located in the farmland, constructive<br>expansion restricted zone and constructive<br>expansion prohibited zone (ecological preservation<br>area). |
| 8.3 Alien Species   | Conformance               | The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity.  |
| 8.4a Commitment to "No Go" in<br>World Heritage properties<br>(exploration and new mines) | Not Applicable            | This Criterion is not applicable to the Entity's Certification Scope.  |
| 8.4b Commitment to "No Go" in<br>World Heritage properties (existing<br>operations)       | Not Applicable            | This Criterion is not applicable to the Entity's Certification Scope.  |
| 8.5a Mine rehabilitation (best available techniques)                                      | Not Applicable            | This Criterion is not applicable to the Entity's Certification Scope.  |
| 8.5b Mine rehabilitation (financial provisions)   | Not Applicable            | This Criterion is not applicable to the Entity's Certification Scope.  |
| PRINCIPLE 9 HUMAN RIGHTS  |                           |  |
| 9.1a Human Rights Due Diligence<br>(policy)   | Conformance               | The Entity has established a Human Rights policy,<br>which includes a policy commitment to respect<br>Human Rights. The Policies are available for internal<br>and external stakeholders by training, publishing on<br>the Entity website and posts on-site. More detailed<br>information, please see:<br>http://www.zfsy.com.cn/gjlnews/1567.html   |
| 9.1b Human Rights Due Diligence<br>(process)  | Minor Non-<br>Conformance | The Entity commits to respect Human Rights and<br>aims to extend this commitment in the supply chain.<br>The Human Rights due diligence process is<br>established covering the supply chain. A minor non-<br>conformance is raised on human rights due diligence<br>process to suppliers as a sample of assessments<br>determined that some suppliers have not completed<br>the Human Rights due diligence assessment.   |
| 9.1c Human Rights Due Diligence<br>(remediation)  | Conformance               | The procedure "Human Rights Due Diligence<br>Procedure" has defined the complaints/grievance<br>mechanism for stakeholders and the remediation<br>action.  |

| CRITERION                                       | RATING      | COMMENT   |
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|   |             | Currently, no remedial actions are required.  |
| 9.2 Women's Rights                              | Conformance | Women's rights and interests are respected. The<br>Entity has identified legal rights for women and<br>implemented control measures to ensure these are<br>met. The procedure "Women's Rights Control<br>Procedure" has defined the processes for the Entity<br>to protect women's rights.  |
| 9.3 Indigenous Peoples                          | Conformance | The Entity respects for the rights and interests of<br>Indigenous Peoples.<br>There are no Indigenous Peoples in this area.   |
| 9.4 Free, Prior, and Informed<br>Consent (FPIC) | Conformance | The Entity is located in an industrial park which has<br>been planned and constructed by the Local<br>Government. There are no new projects or major<br>changes to existing projects proposed.  |
| 9.5 Cultural and sacred heritage                | Conformance | The Entity has committed to protect cultural and<br>sacred heritage. The Entity is located in an industrial<br>park which has been planned and constructed by<br>Local Government. There are no cultural and sacred<br>heritage issues present at the industrial park.  |
| 9.6a Resettlements (avoid or minimise)          | Conformance | The Resettlements Management Procedure has<br>been established. The Entity is located in an<br>industrial park which has been planned and<br>constructed by Local Government. There was no<br>resettlement required, nor is any expected in future.   |
| 9.6b Resettlements (where unavoidable)          | Conformance | The Resettlements Management Procedure has<br>been established. The Entity is located in an<br>industrial park which has been planned and<br>constructed by Local Government, There was no<br>resettlement required, nor is any expected in future.   |
| 9.7a Local Communities (rights and interests)   | Conformance | The Entity has made a commitment to respect the rights and interests of Local Communities. No complaints from Local Communities have been received to date.   |
| 9.7b Local Communities (impacts)                | Conformance | The Entity is located in an industrial park which has<br>been planned and constructed by Local Government.<br>No complaints from local communities were received.<br>The procedure "Communication with Local<br>Communities Procedure" has defined how to prevent<br>and address any adverse impacts on local<br>Community livelihoods resulting from its activities. |
| 9.7c Local Communities<br>(livelihoods)         | Conformance | The Entity has committed to explore with Local<br>Communities any opportunities to respect and<br>support their livelihoods. For example, the Entity  |

| CRITERION  | RATING      | COMMENT  |
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|  |             | employs people from local communities and prevents<br>adverse impacts to their livelihoods. Most of the<br>employees are from Gongyi City. The Entity recruited<br>187 villagers (from Local Communities).   |
| 9.8 Conflict-Affected and High-Risk<br>Areas   | Conformance | The Entity's business or purchasing is not affected by<br>Conflict-Affected and High-Risk Areas. The<br>procedure "Management procedure of Conflict-<br>Affected and High-Risk Areas" defines that the Entity<br>has surveyed the related parties. The Entity's<br>business or purchasing are in China. It is not a<br>conflict-affected area.   |
| 9.9 Security practice  | Conformance | The Entity has implemented security practices that<br>respect Human Rights. The Entity has established a<br>security practice management procedure. This<br>procedure requires security providers to respect<br>Human Rights. All security guards have been trained<br>in Human Rights requirements. To date, no security-<br>related Human rights violations have occurred.   |
| PRINCIPLE 10 LABOUR RIGHT  | S           |  |
| 10.1a Freedom of Association and<br>Right to Collective Bargaining<br>(freedom of association) | Conformance | There are laws that restrict Freedom of Association<br>in China. However, the Entity commits itself to<br>respect workers' rights. Association for Workers was<br>established in accordance to the legal requirement.  |
| 10.1b Freedom of Association and<br>Right to Collective Bargaining<br>(collective bargaining)  | Conformance | There are laws that restrict Collective Bargaining in<br>China. However, the Entity has a Special collective<br>bargaining contract for wages in 2020 covering all<br>employees. The Employee representative approved<br>the contract, and this was also reviewed and<br>registered with the associated Government agency.   |
| 10.1c Freedom of Association and<br>Right to Collective Bargaining<br>(alternative means)      | Conformance | Workers' representatives can represent Workers' concerns with management on behalf of Workers.   |
| 10.2a Child Labour (minimum age)   | Conformance | There is no Child labour or young Workers in the Entity.   |
| 10.2b Child Labour (hazardous)   | Conformance | Child Labour is prohibited in China. Young Workers<br>(16 to 18 years) are under special protection by law<br>and not allowed to work in hazardous working<br>conditions. There is no Child Labour or young<br>Workers in the Entity.<br>The procedure "Child Labour management<br>procedure" and employees' handbook have both<br>defined prohibition of child labour. The Entity doesn't<br>use child labour below 16 years old. And doesn't |

| CRITERION   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | arrange young workers (under 18) undertake dangerous or harmful work, not work overtime.  |
| 10.2c Child Labour (worst forms)  | Conformance | Child labour is prohibited in China. No workers under<br>18 were found in the Entity. The procedure "Child<br>Labour management procedure" and employees'<br>handbook have both defined prohibition of child<br>labour. The Entity doesn't use child labour below 16<br>years old. And doesn't arrange young workers (under<br>18) undertake dangerous or harmful work, not work<br>overtime. |
| 10.3a Forced Labour (human trafficking)                                   | Conformance | The Entity commits itself to comply with the prohibition of Forced Labour, slavery and human trafficking.   |
| 10.3b Forced Labour (deposits, fees, advances)                            | Conformance | The Entity is not involved in Forced Labour. All<br>Employees are hired directly. Workers are not<br>required any form of deposit; recruitment fee or<br>equipment advance.   |
| 10.3c Forced Labour (migrant workers)                                     | Conformance | No Workers are required to lodge deposits or security payments at any time.   |
| 10.3d Forced Labour (debt bondage)  | Conformance | The Entity is not involved in Forced Labour, and does not provide any type of loan to workers.  |
| 10.3e Forced Labour (freedom of movement)                                 | Conformance | The Entity is not involved in Forced Labour. There is no restriction of workers' movement at site.  |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | The Entity is not involved in Forced Labour. There is<br>no retention of original documents of workers, only<br>copies of original documents are kept in workers'<br>personal files.  |
| 10.3g Forced Labour (freedom to terminate employment)                     | Conformance | The Workers in the Entity can terminate the<br>employment with a specific notice period in advance<br>without any penalty. The time for announced<br>termination of the employment is in compliance with<br>the Labour Contract Law.  |
| 10.4 Non-Discrimination   | Conformance | The Entity is committed to non-discrimination. No case of discrimination has been recorded.   |
| 10.5 Communication and engagement   | Conformance | The Entity direct and frequent communication with the workers and the worker representatives is established.  |
| 10.6 Disciplinary practices   | Conformance | The Entity respects its employees and disciplinary measures are in compliance with legal requirements and require the confirmation of any Workers involved.   |

| CRITERION   | RATING                    | COMMENT   |
|---|---------------------------|---|
| 10.7a Remuneration (living wage)  | Conformance               | The wage structure is clearly defined and the basic<br>wage is above the legal minimum wage. The total<br>payment meets the Workers' basic needs; all<br>workers are enrolled in the mandatory social<br>insurance scheme.  |
| 10.7b Remuneration (method of payment)  | Minor Non-<br>Conformance | All payments are documented and paid on time to all<br>Workers by bank transfer on the 25 <sup>th</sup> of every month.<br>However, one minor non-conformance was noted<br>where remuneration from June to December in 2020<br>were not paid on time.   |
| 10.8 Working Time   | Minor Non-<br>Conformance | The working hours are recorded by proximity card.<br>Working hours are monitored and are in compliance<br>with Chinese Labour Law. However, one minor non-<br>conformance was noted where during June to<br>December 2020 some employees overtime<br>exceeded Chinese Labour Law requirements.                      |
| PRINCIPLE 11 OCCUPATIONAL   | HEALTH AND                | SAFETY  |
| 11.1a Occupational Health and<br>Safety (OH&S) Policy (policy)                          | Conformance               | The Entity has established an Occupational Health<br>and Safety Management System and obtained an<br>ISO 45001:2018 certificate.<br>The documented Occupational Health and Safety<br>policy was approved by General Manager.  |
| 11.1b Occupational Health and<br>Safety (OH&S) Policy (workers and<br>visitors)         | Conformance               | The Entity has established an Occupational Health<br>and Safety Management System and obtained an<br>ISO 45001:2018 certificate.  |
| 11.1c Occupational Health and<br>Safety (OH&S) Policy (applicable<br>law and standards) | Conformance               | The Entity has established an Occupational Health<br>and Safety Management System and obtained the<br>ISO 45001:2018 certificate.<br>The documented policy met requirements.  |
| 11.1d Occupational Health and<br>Safety (OH&S) Policy (right to stop<br>unsafe work)    | Conformance               | The Entity has established an Occupational Health<br>and Safety Management System and obtained the<br>ISO 45001:2018 certificate.<br>The documented policy states that Workers have the<br>right to understand the hazards and safe practices<br>for their work, and the authority to refuse or stop<br>unsafe work |
| 11.2 OH&S Management System   | Conformance               | The Entity has established an Occupational Health<br>and Safety Management System and obtained the<br>ISO 45001:2018 certificate. The Entity has<br>documented Occupational Health and Safety<br>Management System that is conformant with<br>applicable ISO 45001:2018.  |

| CRITERION                                     | RATING      | COMMENT   |
|---|-------------|---|
| 11.3 Employee engagement on health and safety | Conformance | The Entity has established an Occupational Health<br>and Safety Management System and obtained the<br>ISO 45001:2018 certificate. The Entity has provided<br>Workers with a mechanism to raise, discuss and<br>participate in the resolution of Occupational Health<br>and Safety issues with management. |
| 11.4 OH&S performance                         | Conformance | The Entity has established an Occupational Health<br>and Safety Management System and obtained the<br>ISO 45001:2018 certificate.<br>The Entity has established the indicators to monitor<br>and evaluate its Occupational Health and Safety<br>performance.  |

#### **Document Control and Version History**

| Revision | Date         | Notes  |
|----------|--------------|--|
| 0        | 1 April 2021 | Initial Certification Audit (Full Certification) |