## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

### NINGBO ASIAWAY AUTOMOTIVE COMPONENTS CO., LTD.

CERTIFICATE NUMBER

241

ASI STANDARD

PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITOR

SHANGHAI KYLIN CERTIFICATION SERVICE CO., LTD.

DATE OF ISSUE

22 DECEMBER 2022

DATE OF EXPIRY

21 DECEMBER 2025

CERTIFIED SINCE

22 DECEMBER 2022

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

Manufacturing of Aluminium Die Casting Parts at Ningbo Asiaway Automotive Components Co., Ltd. The main processes include Melting, Die casting, Trimming, Deburring, Machining, Cleaning, Packaging and Full inspection. Ningbo Asiaway production facility is located in Ningbo, China.

# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

#### **OVERVIEW**

MEMBER NAME	Ningbo Asiaway Automotive Components Co., Ltd.
ENTITY NAME	Ningbo Asiaway Automotive Components Co., Ltd.
CERTIFICATION SCOPE	Manufacturing of Aluminium Die Casting Parts at Ningbo Asiaway Automotive Components Co., Ltd., in Ningbo, China. The main processes include Melting, Die casting, Trimming, Deburring, Machining, Cleaning, Packaging and Full inspection.
SUPPLY CHAIN ACTIVITIES	<ul><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	• 20 – 22 September 2022
AUDIT REPORT SUBMISSION	• 12 November 2022
AUDIT SCOPE	The audit scope covers the production of Aluminium Die Casting Parts by Ningbo Asiaway Automotive Components Co., Ltd. at No. 99, Shengyuan Road, Fenghua Economic Development Zone, Ningbo City, Zhejiang Province, China.
	Supply chain activities included in the audit scope:  Casthouses Semi-Fabrication
	All relevant criteria in the ASI Performance Standard are included in the Audit Scope.
AUDIT OUTCOME	Certification

AUDIT METHODOLOGY	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	22 December 2022 – 21 December 2025
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	21 June 2024
CERTIFICATION NUMBER	241

#### **SUMMARY OF FINDINGS**

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has collected and identified applicable regulations and other requirements and conducts a compliance evaluation annually.	
1.2 Anti-Corruption	Conformance	The Entity has established procedures to control corruption risks from multiple perspectives and provide regular training to employees. The audit department regularly reviews internal business, procurement, and other processes.	
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct, including Environmental, Social, and Governance (ESG) contents. The audit department conducts an internal audit at least annually, and no violations occurred within the past year. More information is available at: <a href="https://www.asiawaygroup.com/duty-detail.html?id=27">https://www.asiawaygroup.com/duty-detail.html?id=27</a>	
PRINCIPLE 2 POLICY & MANAG	BEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an ASI Policy that addresses the environment, health and safety, social responsibility, business ethics, safety management, governance, and procurement.	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The General Manager has approved the ASI Policy which is reviewed annually.	
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non- Conformance	The Entity has communicated the ASI Policy to employees, including via posts on the workshop bulletin board.  However, some front-line employees were unaware of the content of the Policy or the Policy itself.	
2.2 Leadership	Conformance	The Entity has appointed the General Manager as the Management Representative who is responsible for all ASI related activities and affairs.	
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented the Environmental Management System and holds ISO14001:2015 certification.	
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented the Responsible Business Alliance (RBA) Social Responsibility Management System.	

CRITERION	RATING	COMMENT
2.4 Responsible Sourcing	Conformance	The Entity has established a procurement Policy and communicated it to all suppliers. The Policy addresses environmental, social responsibility, and governance requirements:  https://www.asiawaygroup.com/duty-detail.html?id=21
2.5 Impact Assessments	Minor Non- Conformance	The Entity has implemented environmental, social, cultural, and Human Rights Impact Assessments. However, preparatory work has commenced for the addition of new equipment in the die-casting workshop and hazard identification and safety evaluation were not conducted.
2.6 Emergency Response Plan	Conformance	The Entity has established emergency plans, which address production accidents, chemical leakage, typhoon and flood prevention, earthquake, fire, personal injury, and natural gas leakage. Relevant employees have participated in the establishment of emergency plans. In 2022, numerous emergency drills were conducted to cover potential incidents such as fire, chemical leakage, food poisoning, sewage overflow and heat stroke.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions. There is no such activity in this area at present.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, retirement, and divestment. There is no such activity in this area at present.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its sustainability performance covering environment, health and safety, social responsibility, labour, and compliance in the Sustainability Report: <a href="https://www.asiawaygroup.com/duty-detail.html?id=27">https://www.asiawaygroup.com/duty-detail.html?id=27</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has not received any non-compliance notifications and has disclosed this information within the Sustainability Report:  https://www.asiawaygroup.com/duty-detail.html?id=27  There is no record of non-compliance against the Entity on the government corporate credit website.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity pays taxes to the government as required by regulation and has disclosed this information within the Sustainability Report:

CRITERION	RATING	COMMENT
		https://www.asiawaygroup.com/duty-detail.html?id=27
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established the Employee Appeal and Complaint Management Procedure. Employees can provide feedback at the monthly employee reception days and can submit complaints anonymously in the suggestion box. In addition, the Entity has established the Procedure for Handling Complaints and Grievances from Stakeholders and complaints are received by the Audit Department and Human Resources Department. The complaints hotline has been published to interested parties.
PRINCIPLE 4 MATERIAL STEW	ARDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has established the Environmental Product Life Cycle Assessment (LCA) Report, which covers the current Aluminium Product lines. <a href="https://www.asiawaygroup.com/duty-detail.html?id=28">https://www.asiawaygroup.com/duty-detail.html?id=28</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Environmental Life Cycle Report LCA provides cradle-to-gate information. Information other than LCA can be provided if needed.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly communicated its LCA report: <a href="https://www.asiawaygroup.com/duty-detail.html?id=28">https://www.asiawaygroup.com/duty-detail.html?id=28</a>
4.2 Product design	Minor Non- Conformance	As part of the design process, the Entity has conveyed the requirement to reduce the loss of raw materials and waste products. However, there are no clear objectives in the design process documents on improving the efficiency of Aluminium resources, optimising the usage stage, recycling, or waste tolerances.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established the goal and implementation process for 100% utilisation of Aluminium. The Entity has classified waste materials into different levels: Levels 1-2 are recycled internally, Level 3 such as aluminium ash cannot be recycled, and they are sold to recycling companies for reuse.

CRITERION	RATING	COMMENT	
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented processes to separate the Aluminium Process Scrap. Level 1 and 2 waste materials are recovered, classified, and melted in separate furnaces.	
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity produces products for the automotive industry. Non-conforming and scrapped products are collected from workshops or automotive factories and melted in the furnace. When a car is scrapped, it is sent to the disassembly factory. The metal is recycled based on the grade in the disassembly factory.	
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity's products are mainly used in the automotive industry. In the production process, the Entity aims to recycle 100% of scrap. After the car is scrapped, it enters the car dismantling company to recycle various metals based on the legal requirements of 'Detailed Rules for the Implementation of the Administrative Measures for the Recycling of Discarded Motor Vehicles'.	
PRINCIPLE 5 GREENHOUSE GA	AS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated and disclosed its Scope 1 and Scope 2 Greenhouse Gases (GHG) Emissions and energy use: <a href="https://www.asiawaygroup.com/duty-detail.html?id=32">https://www.asiawaygroup.com/duty-detail.html?id=32</a>	
5.2 GHG emissions reductions	Conformance	The Entity has formulated an emission reduction target, reducing the consumption of purchased electric energy by 10%. The Entity is installing a solar power generation system which is expected to be operational by the end of 2022. https://www.asiawaygroup.com/dutydetail.html?id=32	
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE			
6.1 Emissions to Air	Conformance	The Entity has commissioned a third party to assess the exhaust emissions in the workshop, monitor air pollutant emissions and collect	

CRITERION	RATING	COMMENT
		quantitative data. The Entity's air pollutant emissions have not exceeded the limits in the national standard. The workshop has set up a waste gas collection and treatment device on site. The Entity has developed an annual gas pollution abatement plan and has set an abatement target for non-methane gross hydrocarbons for 2022.
6.2 Discharges to Water	Conformance	The Entity has defined the primary areas of wastewater discharge and commissioned a third party to assess the discharged wastewater and collect quantitative data. The Entity's wastewater discharge did not exceed the limits of the national standard. The Entity has installed wastewater treatment facilities, and the wastewater generated is treated and discharged into the municipal pipeline after meeting the required standards. The Entity has developed a water pollution abatement plan and has set an abatement target for wastewater discharges for 2022.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has evaluated its processes and identified the main potential risk of chemical leaks and natural gas leaks. The Entity has developed control measures and designated the persons in charge to manage situations on site and has documented these processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented control measures on site, established an emergency response team and conducted emergency drills for the management of Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an Emergency Response Plan. The necessary facilities are configured and equipped for the implementation of the plan and the required communication with local Stakeholders.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has made an official declaration that no environmental Spills and/or Leakage have occurred from 2021 to the present and this is updated annually. The declaration is available at:  https://www.asiawaygroup.com/duty-detail.html?id=13
6.5a Waste management and reporting (strategy)	Conformance	The Entity has defined the hazardous, recyclable, and non-recyclable waste generated from its production process and the storage and disposal requirements. The Entity has established a management ledger, and seven suppliers have

CRITERION	RATING	COMMENT
		signed the treatment agreements and provided qualification materials involved in waste recycling. In accordance with its Waste Management Strategy, the Entity has established a solid waste reduction plan, which includes a target to reduce the generation of Aluminium ash and solid waste (including domestic waste) by 2022.
6.5b Waste management and reporting (disclosure)	Minor Non- Conformance	The Entity has publicly disclosed its solid waste management plan, the quantity of solid waste disposed of and the disposal methods:  https://www.asiawaygroup.com/duty- detail.html?id=29  However, a small quantity of solid and Hazardous Waste was not disposed of according to the Entity's documented requirements.
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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Conformance	The Entity recovers Aluminium Dross, biscuit, overflow, and machined cut Aluminium chips for remelting internally.
6.8b Dross (recycling)	Conformance	The Aluminium Dross that cannot be recycled and remelted at the Entity is sent to external recycling companies for recycling and processing. These companies recover Aluminium metal from the Aluminium Dross.
6.8c Dross (review of alternatives)	Conformance	The Entity does not landfill the Aluminium Dross. The Entity maintains processing records and a waste management ledger and Aluminium Dross that is not recycled internally is sent to external companies for recycling.
PRINCIPLE 7 WATER STEWARI	DSHIP	
7.1a Water assessment (mapping)	Conformance	The Entity does not source water from natural water bodies, with the supply for daily operations provided by the water company. The Entity has developed a Water Resources Risk Assessment Report which identifies the average daily consumption, the percentage of water supply and water quality:  https://www.asiawaygroup.com/duty-detail.html?id=25
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks and the risks associated with the surrounding environment and water bodies. The level of water-related risk was identified as low. Further information is available in the Water Resource Risk Assessment Report:  https://www.asiawaygroup.com/duty-detail.html?id=25
7.2a Water management (management plans)	Conformance	Although the water-related risk was identified as low, the Entity has implemented a water conservation plan as a corporate strategy. Results of the water conservation activities are available at: <a href="https://www.asiawaygroup.com/duty-detail.html?id=27">https://www.asiawaygroup.com/duty-detail.html?id=27</a>
7.2b Water management (monitoring)	Conformance	Although the water-related risk was identified as low, the Entity has disclosed the results of its water conservation activities at: <a href="https://www.asiawaygroup.com/duty-detail.html?id=27">https://www.asiawaygroup.com/duty-detail.html?id=27</a>
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed the water usage for production and is available at:

CRITERION	RATING	COMMENT	
		https://www.asiawaygroup.com/duty-detail.html?id=25	
PRINCIPLE 8 BIODIVERSITY			
8.1 Biodiversity assessment	Conformance	The Entity has evaluated the impacts on biodiversity and the identified risk sources including environmental pollution, water pollution and Alien Species. The Entity did not identify significant biodiversity impacts in the Biodiversity Assessment Report:  https://www.asiawaygroup.com/duty-detail.html?id=26	
8.2a Biodiversity management (biodiversity action plans)	Conformance	Although the risk and potential impact on biodiversity has been assessed as low, the Entity has established a biodiversity improvement plan that includes greening of the site and protection of canopy trees and plants.	
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Although the risk and potential impact on biodiversity has been assessed as low, the Entity has established a biodiversity improvement plan	
8.2c Biodiversity management (reporting)	Conformance	Although the risk and potential impact on biodiversity has been assessed as low, the Entity has developed control measures and improvement plans for the identified biodiversity risks, which are included in the Biodiversity Assessment Report: https://www.asiawaygroup.com/dutydetail.html?id=26	
8.3 Alien Species	Conformance	The Entity has analysed the risk of Alien Species and has implemented prevention and control measures. No Alien Species are present on the site and there is no record of exotic species notification.	
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
PRINCIPLE 9 HUMAN RIGHTS			

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has an ASI Policy that includes compliance with laws and regulations, freedom and equality, protection of Human Rights, and continuous improvement. The ASI Policy includes a commitment to abide by laws and regulations and protect Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed a 2021 Human Rights Due Diligence Report which discloses the Entity's commitment to the protection of Human Rights and outlines a Due Diligence process to identify the impact on Human Rights: <a href="https://www.asiawaygroup.com/duty-detail.html?id=23">https://www.asiawaygroup.com/duty-detail.html?id=23</a>
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a Control Procedure for Social Responsibility and Business Ethics Risk Management and conducts Human Rights Due Diligence investigations annually. If any issue, the Entity acts to remediate the impact.
9.2 Women's Rights	Conformance	The Entity has established the Procedures for the Protection of Women Workers, which lists the rights and interests of women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there is no cultural or sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as the plant was built on industrial land obtained from the government.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as the plant was built on industrial land obtained from the government.
9.7a Local Communities (rights and interests)	Conformance	The Entity is located in the economic development zone which is located far from Local Communities. However, the Entity has developed an interested party management procedure and defined Local Communities as interested parties.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The Entity is located in the economic development zone which is located far from Local Communities. The Entity has not received any complaints or negative feedback from Local Communities regarding its operations.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs local workers to support the livelihood of people in nearby communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a Conflict Minerals Control Procedure that stipulates that the company does not purchase materials from conflict areas. The supplier fills in the Conflict-Free Minerals Questionnaire and signs the Conflict-Free Metals Declaration.
9.9 Security practice	Conformance	The Entity has developed a Standard Operating Procedure for security guards, which defines the guards' role to focus on people, property, and goods safety.
PRINCIPLE 10 LABOUR RIGHT	S	
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has developed the 'Procedures for Management of Workers' Free Association and Collective Bargaining' which clearly states that the Entity's employees have the right to free association. The Entity has established a Labour Union that Workers can freely choose to join.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has developed the 'Procedures for Management of Workers' Free Association and Collective Bargaining' concerning Workers' rights to Collective Bargaining. The Entity has established the 'Employee Representative Election System' where employee representatives can exercise their rights on behalf of employees.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has established special procedures to clarify that employees have the right to free association. A Labour Union has been established where employees can freely choose to join.
10.2a Child Labour (minimum age)	Conformance	The Entity prohibits the use of Child Labour and has established the 'Procedures for Prohibition of Child Labour' and 'Remedies for Child Labour' which includes the necessary measures that need to be taken if Child Labour is found. The Entity also established the 'Procedures for Protection of Underage Workers' to provide support for the protection of underage Workers. The youngest Worker at the Entity is 19 years.

CRITERION	RATING	COMMENT
10.2b Child Labour (hazardous)	Conformance	The Entity is committed to not supporting any form of Child Labour and underage Workers. The Entity has demonstrated there is no presence of Child Labour or underage Workers.
10.2c Child Labour (worst forms)	Conformance	The Entity has demonstrated there is no presence of Child Labour or underage Workers and does not support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a 'Non-Forced Work Operating Procedure' prohibiting the use of any Forced Labour practices and protects the basic rights of employees to work voluntarily.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established a 'Non-Forced Work Operating Procedure' prohibiting the use of any forced labour practices. All employees of the company are directly employed, and employees are not charged any kind of deposit, Recruitment Fee or Facility and equipment fee.
10.3c Forced Labour (migrant workers)	Conformance	There are no Migrant Workers at the Entity, all employees are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not support any form of Forced Labour including Debt Bondage or forced work. Employees are working voluntarily and are paid in accordance with their entitlements and legal requirements.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity protects the right of employees to work freely and their freedom of movement in the workplace is not restricted. This was verified through interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not seize identification cards or other original certificates and only retains copies of identification on the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	All Employees have signed labour contracts and both parties agree on the contract time in accordance with the requirements of regulations. Employees are free to terminate their employment without penalty.
10.4 Non-Discrimination	Conformance	The Entity has established operating procedures to prevent Discrimination and harassment in accordance with the labour law and has clearly defined Discrimination, harassment, and other acts. The Entity has committed to non-Discrimination and supports equality between men and women and equal pay for equal work.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has established various channels of communication with employees. Workers can communicate with management through the site office, mailbox, telephone, and other means. This was verified through interviews with Workers who confirmed they are aware of the communication methods and channels and are not worried about threats such as retaliation, intimidation, or harassment.
10.6 Disciplinary practices	Conformance	The Entity has developed a procedure that prohibits all forms of corporal punishment and has established a system of rewards and appropriate disciplinary measures that is in accordance with the law.
10.7a Remuneration (living wage)	Conformance	The Entity's paid wages meet the minimum basic wage and are higher than the local minimum wage level. This was verified through documentation such as the salary schedule. Overtime work on weekdays and working days are both paid in accordance with the statutory requirements.
10.7b Remuneration (method of payment)	Minor Non- Conformance	The Entity pays employees' wages by bank transfer and retains a record of payments.  However, the Entity's social insurance payment bases for employees were not reported as required by the local social security bureau.
10.8 Working Time	Minor Non- Conformance	The Entity has implemented an attendance and working hours system. However, Workers across five major departments had Overtime hours that exceeded the requirement for some months, totalling 60 hours per week, and some employees worked more than 36 hours each of Overtime per month.
PRINCIPLE 11 OCCUPATIONAL	HEALTH AND	SAFETY
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System and implemented an OH&S Policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OHS& Policy is displayed and publicised in the Entity's office hall and workshop bulletin boards.  The Entity briefs Visitors on the OH&S management process through videos and site visit requirements such as personal protective equipment.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established an OH&S Management System and implemented an OH&S Policy with a commitment to comply with laws and applicable international conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an ASI Policy that specifies the right of employees to refuse to work in an unsafe environment.
11.2 OH&S Management System	Minor Non- Conformance	The Entity has established and implemented an OH&S Management System. However, there are instances of ineffective implementation of the OH&S Management System regarding occupational disease medical examinations, safety signage, use of PPE and updating the fire inspection form.
11.3 Employee engagement on health and safety	Conformance	The Entity holds regular meetings with the employee representatives. The meetings cover employee occupational health and safety matters, and records of communication of occupational health and safety content are maintained.
11.4 OH&S performance	Conformance	The Entity has established and implemented an Environmental Management System (EMS) and OH&S Management System. The Entity has established target indicators and all the targets are met. The Entity conducts regular management reviews that include an evaluation of OH&S performance and identification of where improvement is needed.

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

Revision	Date	Notes
0	22 December 2022	Initial Certification Audit – Full Certification