ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

PRESS METAL INTERNATIONAL LTD

CERTIFICATE NUMBER 216 ASI STANDARD PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR TÜV RHEINLAND CERT GmbH

DATE OF ISSUE

DATE OF EXPIRY

CERTIFIED SINCE

17 AUGUST 2022

AUTHORISED BY

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

Press Metal International Ltd (China): whole operation, include: Casthouse, Extrusion, Anodizing, Powder Coating, PVDF and fabricated extrusion profile.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Press Metal
ENTITY NAME	Press Metal International Ltd
CERTIFICATION	Press Metal International Ltd (China): whole operation, include: Casthouse, Extrusion, Anodizing, Powder Coating, PVDF and fabricated extrusion profile.
SUPPLY CHAIN ACTIVITIES	 Aluminium Re-melting/Refining Casthouses Semi-Fabrication Other manufacturing or sale of products containing Aluminium
ASI STANDARD	Performance Standard V2
AUDIT TYPE	 Initial Certification Audit (25 – 28 April 2022) Surveillance Audit (8 – 10 February 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	 25 – 28 April 2022 (Initial Certification Audit) 8 – 10 February 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	 23 June 2022 (Initial Certification Audit) 25 April 2023 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (25 – 28 April 2022) The audit scope covers the design and manufacturing of Architectural and Industrial Aluminium Alloy Profiles (Anodized Oxide Profiles, Electrophoretic Painting Profiles, Powder Spraying Profiles, Fluorocarbon Spraying Profiles, Anti-thermal Profiles). Supply chain activities included in the audit scope: Aluminium Re-melting/Refining Casthouses Semi-Fabrication Other manufacturing or sale of products containing Aluminium

	All applicable criteria in the ASI Performance Standard were included in the audit scope.
	<u>Surveillance Audit (8 – 10 February 2023)</u> The audit scope covers the design and manufacturing of Architectural and Industrial Aluminium Alloy Profiles (Anodized Oxide Profiles, Electrophoretic Painting Profiles, Powder Spraying Profiles, Fluorocarbon Spraying Profiles, Anti-thermal Profiles).
	 Supply chain activities included in the audit scope: Aluminium Re-melting/Refining Casthouses Semi-Fabrication Other manufacturing or sale of products containing Aluminium
	All applicable criteria in the ASI Performance Standard were included in the audit scope.
AUDIT OUTCOME	Provisional Certification
AUDIT METHODOLOGY DECLARATION	 The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
	The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
	The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	17 May 2023 – 16 May 2026
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	16 November 2024
CERTIFICATE NUMBER	216

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has established procedures to collect the Applicable Law/regulation which covers labour, ethics, health and safety and the environment. The Human Resources, Administration and Environment, Health and Safety Departments are responsible for the collection and assessment at least once per quarter. Two qualified law officers and the Legal Department ensure the Entity operates according to Applicable Law.	
1.2 Anti-Corruption	Conformance	The Entity has established a Business Ethics Policy/procedure, which covers Anti-Extortion and Bribery, and training is provided to employees. The ethics reporting channel is available on the Entity's website: <u>http://www.pressmetal.com.cn/list/32.html</u> The Due Diligence investigation has included the high- risk positions within the Entity, such as the Purchasing, Sales, and Finance Departments. Employees in these Departments have signed the Honesty Commitment Letter.	
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct and has provided training to Workers. The Code of Conduct has been communicated to suppliers and suppliers have signed the relevant Commitment Letters. The Code is included in the 2021 Sustainable Development Report: <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u>	
PRINCIPLE 2 POLICY & MANAG	BEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a Management System that includes a Policy on environmental, social and governance compliance: https://www.pressmetal.com/esg/#governance-policies	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Commitment to implementing the ASI Management System is established by the senior management team. The effectiveness of the system is reviewed during the annual management review.	
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are available for internal Stakeholders via training. External Stakeholders can access the policies on the Entity's website: https://www.pressmetal.com/esg/#governance-policies	

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Environment, Health and Safety (EHS) Manager has been appointed as the Management Representative to ensure the social, environmental and governance requirements are reflected in the Entity. The authorities and responsibilities of the role are defined in the appointment letter. An ASI team has been established to support the implementation of the ASI Management System.
2.3a Environmental and Social Management Systems (environmental)	Conformance	An Environmental Management System has been established and implemented. The Entity has obtained ISO 14001:2015 certification: https://www.certipedia.com/search/matching_system_c ertificates?&locale=zh-CN&q=01104060460
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established the ASI Management System, which covers the social Management System. Internal audits and management reviews are conducted annually to ensure the effectiveness of the Management System. For the non-conformances, the Entity conducts a root cause analysis and implemented corrective and preventive action.
2.4 Responsible Sourcing	Conformance	The Entity is committed to responsible sourcing and has conducted supplier assessments and required suppliers to sign a commitment letter. The policy is available on the website: https://www.pressmetal.com/esg/#governance-policies
2.5 Impact Assessments	Minor Non- Conformance	The Entity conducted a Social Accountability Risk Assessment covering a gender analysis and the impacts of social, cultural and Human Rights aspects in February 2023, and no high risks were identified. The Entity's ASI System Manual defines the requirement for Impact Assessments to be conducted for all New Projects and Major Changes to the existing facilities. The environmental impact analysis is addressed under the certified ISO 14001 Management System. The Entity has developed an Environment Impact Assessment (EIA) report and received approval for a technical improvement project. The Entity has obtained a Pollution Discharge Permit (http://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk. action?xkgk=getxxgkContent&dataid=b6e698d1d00d4 5ccb3786f2a6ecb8687) However, due to the restrictions associated with COVID-19 in China during 2022, the Entity's Environment Protection Check Approval (EPCA) process, which is legally required for the new facilities, is still in progress.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected Stakeholder groups, the Emergency Response Plans have been established and implemented and training on the plans is provided periodically.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger or acquisition control procedure, including the Due Diligence process. In the past three years, there has been no merger or acquisition in the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closure, decommissioning and divestment control procedure in accordance with the requirement of the ASI Performance Standard. There has been no such case since the ASI Management System became operational or in the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published the Sustainable Development Report on the website: <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u> The Press Metal group, which includes the Entity, has published an Annual Report on the website: <u>https://www.pressmetal.com/investor-relations/reports- presentations.php</u>
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliance and liabilities. The non-compliance issues (such as significant fines, judgement, penalties, and non- monetary sanctions) are disclosed on the website and in the Press Metal Sustainable Development Report for 2021: <u>https://aiqicha.baidu.com/company_detail_324092291</u> <u>72145?tab=risk</u> and <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u> The Sustainable Development Report for 2022 will be publicly available in June 2023.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to requirements on anti-Corruption. The Entity's 2021 financial audit report issued by a qualified third party indicates all payments to the government are based on legal law or contracts. The Entity has disclosed the payments to governments in the Sustainable Development Report: http://www.pressmetal.com.cn/upload/ueditor/2022100 5/202210051203085977.pdf

CRITERION	RATING	COMMENT
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 developed and implemented policies, systems, procedures and processes that conform to the Stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from Stakeholders and has an appropriate Complaints Resolution Mechanism. The communication channels (telephone) are public to internal and external Stakeholders, and included in the Sustainable Development Report: <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u>
PRINCIPLE 4 MATERIAL STEW	ARDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non- Conformance	The Entity has conducted Life Cycle Assessment (LCA) for its four main products, with LCA reports prepared in November 2022. The LCA assessment data covers wastewater and solid waste generated by processes, however, the LCA only covers the environmental impacts from gate to gate, and the impacts from the supply chain are not considered. According to the facility management team, the Entity has made efforts to obtain the requested data from their suppliers however, they have been unable to obtain the relevant information.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented policies and processes for LCA. LCA information is provided upon request. The request channel is included in the Sustainable Development Report: <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented policies and processes for LCA. LCA information will be provided upon request and the Entity will ensure communication of LCA information is adequate and accurate according to ASI requirements. The request channel is included in the Sustainable Development Report: http://www.pressmetal.com.cn/upload/ueditor/2022100 5/202210051203085977.pdf
4.2 Product design	Minor Non- Conformance	The Entity has established procedures for LCA in the product design process to consider environmental impacts including energy consumption, water, air emissions and waste.

CRITERION	RATING	COMMENT
		In the design phase all the environmental factors of LCA have been identified and listed in the final design reports, and the Entity has set quantificational data on GHG. However, quantificational data has not been established for other environmental factors of LCA, such as wastewater, air emissions and solid waste.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and improvement programs for each process to reduce scrap during production. 100% of the Aluminium Process Scrap is recycled by the internal re-melting workshop. The scrap generation rate is reviewed at monthly management meetings to ensure targets are met.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has adequate and effective procedures to classify and dispose of the different kinds of Aluminium scrap. All scrap is classified for alloy separation and recycled at different smelters.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established a strategy for the collection and recycling of Aluminium products at End of Life. The collection and recycling data are maintained by the materials system.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has a system and process to improve the reuse rate of Aluminium. At present, the Entity has signed recycling contracts with customers and recycling companies to collect the scrap of products at End of Life, and related recycling records are maintained. Currently, the Entity is involved in collection and recycling systems at the local level by signing contracts with local recycling companies.
PRINCIPLE 5 GREENHOUSE G	AS EMISSIONS	
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published Greenhouse Gases (GHG) emissions data and source in the Sustainable Development Report, pages 16-17: http://www.pressmetal.com.cn/upload/ueditor/2022100 5/202210051203085977.pdf The GHG emissions calculations are determined internally, and the GHG source inventory and raw data are provided for verification by a third party. In 2021, a total of 73,430.54 tonnes of CO ₂ was emitted from internal activities. The data for 2022 will be public in June 2023.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG emissions reduction target of 2% for 2021 against 2020 data and has implemented improvement programs to achieve the target. The management team reviews progress

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		against the target annually. The Entity has implemented a process to undertake a root cause analysis and implement corrective actions where the target is not met. The Entity's major GHG generation sources are electricity and natural gas, with the source of electricity being 81% coal-fired and 19% solar power.
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, EFF	LUENTS AND W	ASTE
6.1 Emissions to Air	Conformance	The Entity has established an air emissions inventory for all air emission sources and a qualified third party monitors all the outlets according to the monitoring plan. The Entity has established continuous reduction targets for major indexes such as sulphur dioxide, oxynitride and Volatile Organic Compounds (VOCs) and the targets are tracked and reviewed by the management team annually. The Entity has implemented improvement programs to reduce air emissions. Air emissions data are included in the annual Sustainable Development Report: <u>http://www.pressmetal.com.cn/upload/ueditor/2022100</u> <u>5/202210051203085977.pdf</u> The Entity has conducted air emissions monitoring in accordance with its Pollutant Discharge Permit and Applicable Law.
6.2 Discharges to Water	Conformance	The Entity has established a wastewater inventory to control Discharges to Water. Industrial wastewater is collected and treated at the Entity's parent company- owned wastewater treatment plant (WWTP) prior to discharge to the local municipality WWTP. The Entity has monitored the wastewater quarterly and the results are within the limit. The Entity has established a reduction plan for wastewater discharge and the improvement programs are monitored. Wastewater management information is included in the annual Sustainable Development Report: http://www.pressmetal.com.cn/upload/ueditor/2022100 5/202210051203085977.pdf

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6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted annual Spills and Leakages assessments. There are no high risks identified and the Entity has implemented preventive actions and improvement programs for all potential risks.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted annual Spills and Leakages assessments. There are no high risks identified and the Entity has implemented preventive actions and improvement programs for all potential risks. Emergency response programs are established and registered with the local Environment Bureau.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established an environment protection procedure that covers the management and reporting of Spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity had a minor Spill incident in the past year, which was managed according to its emergency response process. The incident is disclosed in the Sustainable Development Report: http://pressmetal.com.cn/upload/ueditor/20220428/202 204281312216201.pdf No Spill case has happened in 2022.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has defined a solid waste management procedure to cover the collection and disposal of all waste. Hazardous Waste is transferred to qualified third parties according to legal requirements and inventory and disposal receipts are kept. The Entity has established continual improvement targets to reduce waste generation and targets are reviewed annually by the senior management team.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has incorporated the waste management information into the Sustainable Development Report: http://pressmetal.com.cn/upload/ueditor/20220428/202 204281312216201.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.

CRITERION	RATING	COMMENT
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.
6.8a Dross (recovery)	Conformance	The Entity complies with the Recycled Materials Management Regulation which defines an adequate and effective process to collect and recycle Aluminium from Dross. Prior to being sent to specialised vendors, the Entity recycles approximately 70% of Dross internally.
6.8b Dross (recycling)	Conformance	Dross is recycled and refined by internal smelters. It is used as a material rather than as waste and the component of Dross that cannot be recycled internally is sold to qualified vendors for use in building materials.
6.8c Dross (review of alternatives)	Conformance	The Entity has reviewed Dross recycling management monthly. Dross is reused internally or recycled externally for use in building materials. There is no landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARD	DSHIP	
7.1a Water assessment (mapping)	Conformance	The Entity has assessed the water consumption via a qualified third party during the Environment Impact Assessment associated with the facility's founding, which indicated the water source is compliant with legal requirements and approved by the local bureau. The Entity has established water mapping and regularly reviews the updates and changes. A water risk assessment is conducted annually, and no high risks are identified.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted an annual water risk assessment, the latest assessment conducted in March 2022, which fully covers the Entity's Area of Influence, and no high risks are identified.

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7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce water consumption and has established programs to achieve the targets.
7.2b Water management (monitoring)	Conformance	The Entity has annual targets to continually reduce water consumption and has established programs to achieve the targets. The targets and progress of programs are reviewed monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed the water usage and risks in the annual Sustainable Development Report: http://www.pressmetal.com.cn/upload/ueditor/2022100 5/202210051203085977.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity's biodiversity assessment is included in the Environment Impact Assessment reports, which were prepared by a qualified third party and identified no negative impacts on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity assessment determined there were no negative impacts on biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity assessment determined there were no negative impacts on biodiversity.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity assessment determined there were no negative impacts on biodiversity.
8.3 Alien Species	Conformance	The Entity has annually assessed the Alien Species and no Material risk has been identified.
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.

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PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established its Policy and procedure for compliance with Human Rights in its ASI Management Manual. The policy is available on the website: <u>https://www.pressmetal.com/esg/#governance-policies</u> The Entity has identified Human Rights risks and provides relevant training for all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a procedure to conduct Human Rights Due Diligence. The Entity conducts Human Rights Due Diligence for Communities, suppliers/Contractors and internally according to the procedure.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to Stakeholders: <u>http://www.pressmetal.com.cn/list/32.html</u> There have been no adverse impacts reported, therefore no remedy is needed.
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met, such as providing sufficient protection to pregnant Workers and nursing mothers. Around 50% of the management staff are female. Female Workers are treated the same as male Workers, with equal pay, access to training and promotion.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	The Entity's Environmental Impact Assessment (EIA) process determined that cultural and sacred heritage sites and values are not affected.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity's Environmental Impact Assessment (EIA) report determined that resettlement was not necessary.
9.6b Resettlements (where unavoidable)	Conformance	The Entity's Environmental Impact Assessment (EIA) report determined that resettlement was not necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established the ASI management manual, which includes the procedure that the Entity respects the legal and customary rights and interests

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		of Local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity is located within an industrial park and the nearest Community is approximately 1.5km away. Some of its employees are from the local area. The Entity has installed environmental protection devices to reduce the impact of air emissions and boundary noise on the Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs some Workers from the Local Communities. The Entity has established plans to support the surrounding communities, such as providing job opportunities and donating to Local Communities and environmental protection organisations.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established the ASI management manual, which includes the procedure that the Entity commits to not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity's internal Due Diligence investigation reports and the signed supplier commitments, have identified that no materials are from CAHRAs.
9.9 Security practice	Conformance	Security at the Entity is provided by a qualified third party. The Entity has implemented the Security Code of Conduct to respect Human Rights. All security staff are trained on the policy and procedure, which includes anti-harassment, anti-abuse and anti-Forced Labour.
PRINCIPLE 10 LABOUR RIGHTS	6	
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits to respecting the Workers' rights. There are twenty-two elected Worker representatives in the Association for Workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of Workers to Collective Bargaining, and to participate in any Collective Bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives deal with Workers' concerns with management on behalf of the Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use Child Labour (under 16 years) or young Workers (between 16 to 18 years). The Entity has established procedures to ensure no Child Labour

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		is hired and to protect young Workers. All interviewed Workers report that no child labour is used.
10.2b Child Labour (hazardous)	Conformance	The Entity does not use Child Labour or young Workers (between 16 to 18 years). If young Workers are used, they are under special protection and are not allowed to work in hazardous working environments.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use Child Labour or young Workers. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI management manual and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. The Entity does not use Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. All employees are employed directly, and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. There are no foreign Migrant Workers at the Entity, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. There is no restriction on Workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The Entity does not hold any original documents, passports or permits, only copies are retained in the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established an ASI management manual and procedure to ensure it is not involved in Forced Labour. The time for announced termination of the working contract is regulated in the labour contract.

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10.4 Non-Discrimination	Conformance	The Entity has established a procedure for anti- Discrimination which includes processes for hiring, salary, promotion and. The Entity provides equal pay for Workers with a disability.		
10.5 Communication and engagement	Conformance	The Entity undertakes direct and frequent communication with Workers and the Worker representatives on the Worker's councils. A positive working environment and direct communication were noted by interviewed Workers. The Entity conducts a monthly satisfaction survey to collect Workers' feedback.		
10.6 Disciplinary practices	Conformance	In accordance with the Entity's ASI management manual, the Entity does not tolerate any form of punishment or harassment. It requires its suppliers to comply with relevant policies and procedures. Disciplinary measures are regulated by law and require written evidence and the involvement of the Worker representative. Workers are trained and communicated on the disciplinary control procedure. All disciplinary records are confirmed by both Workers and management.		
10.7a Remuneration (living wage)	Conformance	The Entity's wages are in compliance with legal standard and meets the basic needs of Workers. All the employees are enrolled in the social insurance and housing funds.		
10.7b Remuneration (method of payment)	Conformance	In accordance with payroll records, wage payments are documented and paid to Workers on the 15th of each month directly into the employees' bank accounts There have been no delayed payments over the past 12 months.		
10.8 Working Time	Minor Non- Conformance	The Entity has established and implemented a procedure to provide paid annual leave, sick leave, marriage leave and maternity leave to Workers. Working hours are recorded and monitored. All Workers have one day off every seven days, and their daily Overtime hours do not exceed the legal requirement. However, it was identified in some cases that monthly Overtime hours exceeded 36 hours and weekly working hours exceeded 60 hours.		
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a valid ISO 45001:2018 certification (3 January 2023 - 2 January 2026) that covers the Certification Scope. The Entity has established formal		

CRITERION	RATING	COMMENT
		policies for Occupational Health and Safety (OH&S) and has posted the policy in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has adequate and effective policies and procedures to ensure all Workers and Visitors follow internal OH&S requirements, including orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has established formal policies for OH&S including legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has established formal policies for OH&S including the right to stop unsafe work and providing a safe working environment.
11.2 OH&S Management System	Conformance	The Entity has a valid ISO 45001:2018 certification. In the latest OH&S Management System audit, conducted in December 2022, one minor finding was detected, and the Entity has taken corrective action and the finding has been closed.
11.3 Employee engagement on health and safety	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has adequate and effective mechanisms to collect Workers' feedback on OH&S. The mechanisms include suggestion boxes, worker representative meetings, irregular worker interviews and accident/injury analysis.
11.4 OH&S performance	Conformance	The Entity has established targets and control programs for accident/injury/fire on OH&S. The Entity's management has reviewed the programs and targets on a monthly basis.

Document Control and Version History

Revision	Date	Notes
0	17 August 2022	Initial Certification Audit – Provisional Certification
1	16 May 2023	Surveillance Audit – Full Certification