

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ALG ALUMINIUM INC.

CERTIFICATE  
NUMBER

228

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

17 NOVEMBER 2022

DATE OF EXPIRY

16 NOVEMBER 2025

CERTIFIED SINCE

17 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a light green background.

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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Manufacture of Aluminium alloy products including  
casting, extrusion, hot-rolling and cold rolling  
products in Nanning, China.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	ALG Aluminium Inc.
ENTITY NAME	ALG Aluminium Inc.
CERTIFICATION SCOPE	Manufacture of Aluminium alloy products including casting, extrusion, hot-rolling and cold rolling products in Nanning, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (2 – 4 August 2022)</li><li>Surveillance Audit (11 – 14 December 2023)</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>2 – 4 August 2022 (Initial Certification Audit)</li><li>11 – 14 December 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>9 September 2022 (Initial Certification Audit)</li><li>6 February 2024 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (2 – 4 August 2022)</u></p> <p>The audit scope covers the ALG Aluminium Inc. production plant that manufactures Aluminium alloy products including casting, extrusion, hot-rolling and cold rolling products.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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Surveillance Audit (11 – 14 December 2023)

The audit scope covers the ALG Aluminium Inc. production plant that manufactures Aluminium alloy products including casting, extrusion, hot-rolling and cold rolling products.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

Certification

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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.
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CERTIFICATION  
PERIOD

17 November 2022 – 16 November 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

16 November 2025

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CERTIFICATE  
NUMBER

228

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established procedures to identify applicable legal laws and regulations. The legal department is responsible for its management and assessment at least once per year, relating to legislation on labour, ethics, health and safety and the environment.
1.2 Anti-Corruption	Conformance	The Entity has implemented Policies and processes to identify and prevent Corruption and has provided training to employees. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. All employees and suppliers must sign the anti-Corruption agreement. There have been no cases of misconduct reported to date.
1.3 Code of Conduct	Conformance	The Entity has formulated a Code of Conduct, including environmental, social and governance principles. The Entity conducts an internal audit and management review every year to review the Code of Conduct. Awareness of the Code of Conduct for staff is raised through various measures, including meetings and training.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established the Environmental, Social, and Governance Policy. The Policy is available at: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented Environmental, Social, and Governance Policies which have been approved by the Entity's General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has established an ASI Performance Standard Manual, including Policies and procedures which are communicated internally and publicly disclosed at: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
2.2 Leadership	Conformance	A Senior Management Representative has been appointed, with responsibilities and authority clearly defined.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has developed and implemented an Integrated Management System which is ISO 14001:2015, and ISO 45001:2018 certified. In addition, the Social Management System for Human Rights and Labour Rights and interests is covered in the ASI Performance Standard Manual for the management of the Social Management System. This also includes the broader community in the Entity's Area of Influence
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity is committed to responsible sourcing. Responsible sourcing is implemented by the Entity through the signing of ASI commitment letters, supplier assessments and emphasis on suppliers to implement the requirements of the ASI Performance Standard. However, it was identified the Entity has not effectively implemented the Supplier Management Procedure. Some suppliers were not managed according to the internal procedure, they did not sign a commitment letter, or an assessment of suppliers was not conducted.
2.5 Impact Assessments	Conformance	The Entity has established and implemented Human Rights Due Diligence procedures, assessed impacts regarding environment, health and safety based on risk assessment of ISO14001 and ISO 45001 standards, and impacts regarding social responsibility including Human Rights through the social management questionnaire.
2.6 Emergency Response Plan	Conformance	The Entity holds a valid ISO 14001 and ISO 45001 certification. Emergency Response Plans have been developed and implemented, and personnel training and records of emergency drills being performed were verified during the Audit.
2.7 Mergers and Acquisitions	Conformance	The Entity has implemented a Mergers and Acquisitions administration procedure from the parent company, GIG Advanced Metals Group. No Mergers or Acquisitions have occurred to date.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented Administrative Measures for the Approval of the Exit of Property Rights (Assets) of the parent company, GIG Advanced Metals Group. No closures,

CRITERION	RATING	COMMENT
		decommissions or divestments have occurred to date.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's 2022 Sustainability Report is available at: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
3.2 Non-compliance and liabilities	Conformance	This Entity has established and implemented interim measures for pursuing responsibility for illegal operations and investment. There are no non-compliance or liabilities recorded in the 2022 Sustainability Report. In accordance with the official websites of the relevant government agencies, no such cases have been raised by the government agencies.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in their 2022 Annual Financial Audit Report, with tax payment certificates available.
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	This Entity has established and implemented a Stakeholder complaint, grievances and requests procedure, which includes the Entity's contact details and other information for Stakeholders. The Entity's Human Resources Department tracks the requests and complaints and has established an appropriate resolution mechanism.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the Life Cycle Assessment (LCA) requirements. LCAs for all related products have been finalised according to the LCA management procedure.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate LCA information for its Aluminium products. The LCA focuses on the environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 standards to advance consistency and

CRITERION	RATING	COMMENT
		comparability of assessments. The LCA studies are available upon customer request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Product Life Cycle Assessment Report is published on the Entity's website: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
4.2 Product design	Conformance	The Entity has integrated relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its operations and has targeted 100% of scrap for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established a Scrap and Dross Classification and Management Procedure to classify and dispose of the different types of Aluminium Process Scrap. All scraps are classified and separated by alloy, sent to different smelters, and related records are maintained.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling target and plan, including specific timelines, activities and targets. The Entity has communicated with its main customer on how to improve the recycling rate of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity continues to work with its customers to decide how to improve the recycling rate of products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
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, available at: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a> The GHG Emissions data is not verified by a third party.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target for 2022 to reduce natural gas by 4.8%, electricity by 5.0% and diesel fuel by 23.1% based on 2021 levels, and aligning with the Group target. Programs to achieve the target include upgrading and transforming equipment, phasing out high energy-consuming facilities, reduce

CRITERION	RATING	COMMENT
		energy consumption. Other programs include the distribution of photovoltaic projects in workshops, increasing green energy use to achieve goals and the regular tracking of all energy data.
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's air emissions are quantified in the Environmental Impact Assessment Report. The Entity has treatment facilities in place and monitors its, Emissions to Air on a quarterly basis. These emissions currently adhere to the local legal emission limit.
6.2 Discharges to Water	Conformance	Discharges to Water are addressed and managed within the Environmental Management System. The Entity has established water reduction targets and established a related plan to minimise adverse impacts. Wastewater monitoring results include major pollutants and indicate they are within the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted regular Spill and Leakage assessments and developed a list of leak risk factors. No high-risk situations have been identified, however the Entity has taken preventive actions and implemented improvement programs for the risks identified.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of Spills and Leakage are defined in the Environmental Management System and follow the control measures identified in the list of leak risk factors. The Entity has established an Emergency Response Plan which includes external communication processes. Major Spills and Leakages are managed and communicated by the Entity's Emergency Response Team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has stipulated relevant requirements for the reporting of Spills as part of the Environmental Emergencies Plan which addresses the reporting of Spills to local authorities and affected people



CRITERION	RATING	COMMENT
		immediately. There have been no Spill incidents at the Entity.
6.4b Reporting of Spills (regular reporting)	Conformance	There have been no Spills at the Entity for several years. The Entity has established an Environmental Emergencies Plan which addresses the reporting of Spills to local authorities and affected people immediately and disclosure in the annual Continual Development Report, which is available upon request.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established an ISO14001 certified Environmental Management System and implemented a Waste Management Procedure which defines the processes to collect and dispose of waste. The Entity has established continual improvement targets to reduce the waste generation per unit which are reviewed quarterly by the management team.
6.5b Waste management and reporting (disclosure)	Conformance	The quantities of Hazardous and Non-Hazardous Waste generated by the Entity and their disposal methods are reported annually, and available at: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
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) (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.

CRITERION	RATING	COMMENT
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's Dross management procedure addresses the process of collecting and recycling Aluminium Dross. The Entity has implemented processes to recycle the Aluminium internally. Nearly 100% of the Aluminium Dross is sold and recovered by an external contractor.
6.8b Dross (recycling)	Conformance	The final Aluminium Dross is recycled by a qualified contractor and is used as a material rather than as waste.
6.8c Dross (review of alternatives)	Conformance	The Entity conducts a monthly review of their Dross recycling management to identify any improvement programs to reduce the final Dross quantities. The final Aluminium Dross is recycled by a qualified contractor of the Entity and there is no landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a water-related risk analysis, including a water balance, to determine and map the source and type of water it draws and uses. The Entity maintains a water balance statistical data table for 2022, water resources management goals and plans and a water balance chart.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water-related risk assessment. The assessment considered the Entity's industrial park location, nearby lands and waterways risks within their Area of Influence. Due to the nature of the product and production processes, the Entity has a closed-loop water Management System. The level of water-related risk was low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no significant water-related risks identified in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no significant water-related risks identified in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity has published its water usage and risk assessment in the Water Resources Risk Assessment Report, sections 4-8: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has established procedures for the protection of Biodiversity. A Biodiversity risk assessment report has been prepared. The Entity is located in an industrial park and there are no protected flora or wildlife in the area. There is no significant risk of Biodiversity impact.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the Biodiversity risk assessment, did not identify significant Biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the outcome of the Biodiversity risk assessment, did not identify significant Biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the outcome of the Biodiversity risk assessment, did not identify significant Biodiversity impacts.
8.3 Alien Species	Conformance	The Entity has stipulated the requirements for evaluating and controlling risks of Alien Species in the ASI Performance Manual which may be accidentally introduced through operational activities. 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 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 mines)	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.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Social, Environmental and Governance Policy that includes a Policy commitment to respect Human Rights and employees' civil rights and to eliminate Discrimination. The Policy is included on posts on-site, communicated to all employees and published on the Entity's website: <a href="https://www.algig.cn/shze-detail.jsp?id=10862">https://www.algig.cn/shze-detail.jsp?id=10862</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and aims to extend this commitment in the supply chain. The Human Rights Due Diligence process is established covering the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted a Human Rights Due Diligence assessment. There have been no adverse Human Rights impacts reported since the Entity's establishment and as a result, remediation is not required.
9.2 Women's Rights	Conformance	The Entity has developed a special group management method, which includes female Workers and others such as underage Workers, student Workers, and disabled Workers to protect their rights and interests. The Entity has clarified the legitimate rights of women and implemented control measures to ensure that those rights are met. No complaints have been received from women Workers and confirmed through interviews they know their rights.
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 are no cultural and sacred heritage sites within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no projects that require Resettlement within the history of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no projects that require Resettlement within the history of the Entity.

CRITERION	RATING	COMMENT
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented community participation control procedures and respects the legal and customary rights and interests of Local Communities. There have been no complaints received by Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity is in close contact with surrounding communities and the majority of employees are from the local area. The Entity has installed environmental protection devices, such as air emission treatment facilities and measures to reduce boundary noise, as indicated in the Environmental Impact Assessment Report.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with surrounding Communities and most of its employees are from the local area. The Entity has established a plan to support the surrounding communities, which includes supporting local charities and participating in community public welfare activities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has developed and implemented measures for the control of conflict minerals, commits to not use conflict minerals and communicates this commitment through the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a commitment letter to not use conflict minerals. To date, no complaints on this issue have been received.
9.9 Security practice	Conformance	The Entity has implemented a Management System to manage entries and exits and clearly defines the primary role of security guards as to protect people, property and assets and to respect Human Rights. All security guards have been trained on Human Rights requirements and to date, no security-related Human Rights violations have occurred.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, there are Applicable Laws that restrict the right to Freedom of Association and Collective Bargaining in China. However, the Entity complies with the Applicable Law on the right to Freedom of Association and Collective Bargaining in China.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, there are Applicable Laws that restrict the right to Freedom of Association and Collective Bargaining

CRITERION	RATING	COMMENT
		in China. However, the entity complies with the Applicable Law on the right to Freedom of Association and Collective Bargaining in China.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws required for the Freedom of Association in China. The Entity supports alternative means of association for Workers, has implemented a Freedom of Association and Collective Consultation Policy and a Labour Union exists.
10.2a Child Labour (minimum age)	Conformance	The Entity has developed and implemented a Child Labour Policy. There is no Child Labour or any young Workers at the Entity, the youngest Worker is 19 years old. During recruitment, the age of candidates is verified by checking identification records.
10.2b Child Labour (hazardous)	Conformance	The Entity does not support Child Labour. Young Workers are under special protection by labour standards law and are not allowed to work in hazardous working conditions. The Entity does not recruit or hire Child Labour or any young Workers.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself and expects its suppliers, to comply with the prohibition of Child Labour. There is neither Child Labour nor any young Workers present in the Entity. The Entity communicates this requirement to the Workers and its suppliers to ensure the legal requirements on Child Labour and Young Workers are followed internally and throughout the supply chain.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established and implemented a procedure for the prevention of involuntary labour and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. There is no Forced Labour present at the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	As verified by Worker and management interviews and payroll information, the Entity is not involved in Forced Labour. Employees are not required to provide any form of deposit, Recruitment Fee or advance at any stage of their employment.
10.3c Forced Labour (migrant workers)	Not Applicable	This Criterion is not applicable as there are no Migrant Workers at the Entity, as all Workers are Chinese.

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not provide any form of loan to Workers. The labour contracts signed between the Entity and Workers do not have any terms that hold Workers in Debt Bondage. The payslips of Workers indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict Worker's freedom of movement throughout the site. Workers are free to leave the Entity's premises when they are not engaged in work. Workers can move freely to access basic liberties and can attend external medical facilities as required. Interviewed employees stated there were no constraints to their movements.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. The original documents of the Workers are not retained, only copies are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of the employment is in compliance with the labour contract law which is 30 days in advance, or three days within the probation period
10.4 Non-Discrimination	Conformance	The Entity has implemented an Anti-Discrimination, Harassment and Abuse Procedure that effectively ensures equal opportunity. The Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	The Entity has developed and implemented an employee complaints management procedure with a grievance and complaints hotline and email address. There are regular meetings between trade union representatives and senior management, and the Entity has implemented operating procedures to ensure open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues.
10.6 Disciplinary practices	Conformance	The Entity does not tolerate any form of punishment or harassment. Suppliers are required to comply with the Entity's Policy and procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker representation. All disciplinary records

CRITERION	RATING	COMMENT
		require the confirmation of Workers and management.
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented a compensation management procedure. The wage structure is clearly defined, the basic wage is above the local legal minimum wage and compensation for Overtime meets the legal requirements. The total payment meets the Workers' basic needs, and all employees are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid promptly to all Workers by bank transfer on the 15th of each month.
10.8 Working Time	Conformance	The Entity has implemented an attendance and working hours system. Based on the attendance records of forty-three sampled employees of the previous 12 months (Nov 2022 to Oct 2023) and worker interviews, the working hours are monitored and are in compliance with Chinese Labour Law. There are three shifts in the factory (Shift 1: 00:00-8:00, Shift 2: 8:00-16:00, Shift 3: 16:00-24:00), the Overtime hours were within 36 hours per month. Overtime is voluntary and Workers can refuse Overtime work if they want to. The total working week does not exceed 60 hours, and Workers are guaranteed at least one rest day per week.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity holds a valid ISO 45001:2018 certificate covering the Certification Scope. The Entity has established formal Policies for Occupational Health and Safety (OH&S) that are posted in the internal public areas.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has adequate and effective Policies and procedures to ensure that all Workers and Visitors comply with internal OH&S rules, including orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is certified to ISO 45001:2018, which covers the Certification Scope. The OH&S policy includes a commitment to comply with legal requirements, Worker health and safety and other requirements. The Entity has established systems to identify all applicable legal requirements and other requirements and evaluate legal compliance.



CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established formal Policies on OH&S including the right to stop unsafe work and to provide a safe working environment.
11.2 OH&S Management System	Minor Non-Conformance	The Entity is certified to ISO 45001:2018, which covers the Certification Scope. The Entity has established adequate and effective procedures for the control of OH&S. However, based on on-site observations, it was identified that some chemicals (e.g. lubricants) were found to be missing hazard labels, which is inconsistent with the requirements of the Material Safety Data Sheets (MSDS).
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented adequate and effective mechanisms to collect Worker feedback on OH&S issues. The mechanisms include suggestion boxes, Worker's representatives' meetings, periodic Worker interviews, and accident and injury analysis.
11.4 OH&S performance	Conformance	The Entity has established targets and control programs for OH&S performance, including accidents, injuries and fires. Management reviews the program and targets monthly.

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

Revision	Date	Notes
0	17 November 2022	Initial Certification Audit - Full Certification
1	16 February 2024	Surveillance Audit