

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Jiangsu Kuna New Energy Co., Ltd.

CERTIFICATE NUMBER
357

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
6 FEBRUARY 2024

DATE OF EXPIRY
5 FEBRUARY 2027

CERTIFIED SINCE
6 FEBRUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Stewardship', with a long horizontal line extending to the right.

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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

The manufacture of Aluminum
profiles at Jiangsu Kuna New
Energy Co., Ltd., China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Kuna New Energy Co., Ltd.
ENTITY NAME	Jiangsu Kuna New Energy Co., Ltd.
CERTIFICATION SCOPE	The manufacture of Aluminum profiles at Jiangsu Kuna New Energy Co., Ltd., China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">20 – 21 December 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">17 January 2024
AUDIT SCOPE	<p>The audit scope includes the manufacture of Aluminum profiles at Jiangsu Kuna New Energy Co., Ltd.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Semi-FabricationMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	6 February 2024 - 5 February 2027
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE 6 August 2025

CERTIFICATE NUMBER 357



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

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Jiangsu Kunna Industrial Co., Ltd. is situated in Xiangshui County Industrial Economic Zone, Yancheng City, Jiangsu Province. It was established in July 2018 and covers an area of 200m². The Entity currently employs 300 people. Over the past five years, the Entity has consistently provided customers with high-quality products, technical support, and reliable after-sales service. Its main business involves the rolling processing and sales of Aluminum profiles.

The Entity continuously innovates in materials, processes, equipment, and applications, and aims to improve its processes, quality, and delivery. High-level auxiliary equipment, such as German Otto Junker's Aluminum rod heating furnace, Italian OMAV's rear auxiliary equipment, and Swedish IUT aging furnaces and mould furnaces, have been introduced to ensure high efficiency and stability of the product. The Entity also possesses first-class testing instruments, including an Israel Lemit cross-section measuring instrument, a British Arun chemical composition measuring instrument, a tension tester, a Brinell/Vickers hardness tester, and others. With strong technical strength and rich industry experience, the Entity provides customers with a complete set of Aluminum supply solutions. It has obtained quality, environmental, occupational health and safety, IATF16949, industrialisation integration, intellectual property, and energy management system certifications. The Entity products cover the fields of rail transportation, automobiles, new energy, and high-quality civilian building profiles, with more than 10,000 section models and over 40 patents.

The nearest town to the Entity is Chenjiagang Town, located approximately eight kilometres away, with no sensitive receptors nearby. The main external Stakeholders include the Xiangshui County People's Government, Xiangshui County Rural Commercial Bank, Xiangshui County Emergency Management Bureau, and Xiangshui County Ecological Environment Bureau.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	High	Medium	Medium
OVERALL	Medium			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures, and processes to comply with relevant legal requirements. The Entity's legal compliance department is responsible for the implementation of Applicable Laws, regulations and other requirements within the organisation and conducts legal Compliance reviews on an annual basis. The Entity has fully identified the Applicable Laws, regulations, and other requirements, including customer requirements. There are currently no significant Compliance issues.
1.2 Anti-Corruption	Conformance	The Entity has implemented Policies and processes including the Management Procedure of Anti-Corruption to identify and prevent Corruption. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing standards. Registers of misconduct and periodical internal control audit reports confirm that no Corruption cases were reported in 2022 and 2023.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct which includes principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among business partners and suppliers.</p> <p>A formal review of the Code of Conduct is conducted annually, and the Entity will review the conformance with, and effectiveness of, the Code of Conduct when there are any changes to the Business that bring about significant changes, or when there are indications of control deficiencies.</p> <p>The Code of Conduct is available for all interested Stakeholders at: http://jskuna.com/data/upload/202401/1704679084171494.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity Management Policy is consistent with environmental, social, and governance practices. The Policy is communicated to all employees internally and publicly disclosed in the 2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf</p> <p>The Entity will review the Policy annually and when there are any changes to the Business that may result in significant changes in environmental, social and governance risks, or if there are indications of control deficiencies.</p>
2.2a-c Leadership	Conformance	The Entity's System Department Supervisor is the nominated ASI Management Representative and is responsible for the establishment and implementation of the ASI Standards. They are responsible for communicating ASI policies throughout the whole Entity. A cross-departmental ASI working group is established to implement the ASI Standards, ASI Policies and management procedures are communicated to all employees through various training courses.

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 implemented a Social Management System. Social impacts and relevant risks such as human rights, occupational health and safety, and business ethics are identified and assessed. Associated management provisions for preventing and/or mitigating these impacts are also established and implemented.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented policies, systems, procedures, and processes that conform to responsible sourcing requirements. The Entity conducts second-party Due Diligence audits at major next-tier suppliers' sites as part of the pre-qualification process.</p> <p>The Entity's procurement team and relevant personnel are trained on responsible sourcing requirements on an annual basis. The Purchasing Policies can be found in the ASI Policy: http://www.jskuna.com/data/upload/202401/1704679085184257.pdf</p> <p>According to the 'ASI Documented Management' procedure, except for the periodical management reviews, the purchasing policies will be reviewed when there are any changes to the Business that bring about significant changes, or if there are indications of control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity, as they have not undertaken any new construction projects or made significant changes to existing Facilities since 2022. It has implemented ISO14001 and ISO45001 Management Systems, with annual review and modification of environmental, health, and safety risk and control plans. The environmental and social impact management plan is reviewed every five years, with re-assessment triggered by Business changes or control gaps leading to significant risks.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity, as they have not undertaken any new construction projects or made significant changes to existing Facilities since 2022. The Entity implements procedures to identify and assess risks to human rights and Business ethics. The Human Rights Impact Assessment Report and Management Plans are publicly disclosed at: http://www.jskuna.com/data/upload/202401/1704679084717253.pdf
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates. As part of its management processes, the Entity has developed and implemented Emergency Response Plans. The audit has verified the training of emergency response personnel and the execution of drills. The Emergency Response Plans have been formally registered with relevant government agencies and are publicly disclosed on the Entity's website, available at:</p> <p>Emergency Response Plan for Production Safety Accidents: http://www.jskuna.com/data/upload/202401/1704679087116168.pdf</p> <p>Emergency Response Plan for Environmental Emergencies: http://jskuna.com/data/upload/202401/1704679086172284.pdf</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has developed a 'Provisions on Decision-Making and Administration of Critical Business Matters' procedure to address situations where it may have to suspend, or significantly alter operations due to factors outside its control. The Entity commits to adhere to Applicable Law and company policies regarding redundancies and consulting with employee organisations. The suspension process and management procedure will be reviewed in case of Material environmental, social and governance risk(s) caused by Business changes or any indication of control gap and will be reviewed annually. No suspension activities have occurred within the last three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure for Mergers and Acquisitions (Investment and Construction Projects Management Procedure), senior management commits to conduct Due Diligence processes for Mergers and Acquisitions and review its environmental, social and governance practices including those associated with Historic Aluminium Operations. No Mergers and Acquisitions have occurred within the last three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity had established a management procedure for Closure, Decommissioning and Divestment (Provisions on decision-making and administration of critical business matters), senior management commits to review environmental, social and governance practices in the planning process for Closure, Decommissioning and Divestment and develop a plan for monitoring of Material environmental, social and governance impacts. No Closure, Decommissioning and Divestment activities have occurred within the last three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity had implemented a Materiality assessment process, where key concerns of Stakeholders were identified, including air pollution and Hazardous Waste management. The management approach and discussion of performance relating to Material issues are disclosed in the 2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in the 2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf
3.3a-c Payments to Governments	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 reported in the 2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a complaints/grievance handling mechanism. The Stakeholder Complaint Handling Procedures is available at: http://jskuna.com/data/upload/202401/1704679085337993.pdf No significant complaints have been received.

CRITERION	RATING	COMMENT
		Stakeholder complaints, grievances, concerns, and resolution approaches are reviewed annually at the ASI management review meeting. The Entity commits to review the complaints resolution after any changes to the Business that alter Material environmental, social and governance risks, and if there is any indication of a control gap occurred.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has developed Environmental Life Cycle Assessment (LCA) Reports for two products: Extrusion products and Solar panel frames and all production lines and main supporting activities, such as transportation. The Entity identifies and quantifies inputs (raw material and energy), production process and output (product, waste emission and discharges including air, Greenhouse Gases, water and solid wastes).</p> <p>However, it has been identified that the discharges relating to solid waste are not divided amongst the two products respectively..</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's LCA Report provides cradle-to-gate information on its Aluminium Products. The Environmental LCA Report is available at: http://jskuna.com/data/upload/202401/1704679084182086.pdf</p> <p>The Environmental LCA Report can be provided to customers upon request, however, there have been no requests received to date.</p>
4.2 Product Design	Conformance	The Entity has established control measures and objectives for manufacturing process design activities and discusses with the customer to revise product specifications to reduce the waste generated from its manufacturing processes, save resources, and mitigate environmental impacts.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets and relevant management programs to minimise the generation of Aluminum Process Scrap within its operations. 100% of Process Scrap is collected and sent to a CASHOUSE for recycling. The separation of Aluminium alloy separation is not required.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has implemented a Scrap Recycling Strategy, available at: http://jskuna.com/data/upload/202401/1704679084758585.pdf</p> <p>The Entity is currently discussing a potential project to increase the recycled Aluminium within its current location. If approved, the project is expected to commence in 2026.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	As there are no formal local, regional or national collection and recycling systems in China, the Entity discusses with their main customer how to improve the recycling rate of products at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has calculated Material Greenhouse Gases (GHG) emissions in the defined boundary in 2022, the calculation includes Scope 1, 2 and 3 Material emissions such as the purchase of raw materials and transportation. The 2022 GHG Emissions Report was verified by a third party. The 2022 GHG Emissions Report and the verification statement

CRITERION	RATING	COMMENT
		are available at: http://jskuna.com/data/upload/202401/1704679085470915.pdf http://www.jskuna.com/data/upload/202401/1704679085680693.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has established a GHG emission reduction plan including targets and the associated approaches in compliance with national decarbonisation targets and has publicly disclosed the GHG Emission Reduction Plan and Pathway at: http://jskuna.com/data/upload/202401/1704679083536013.pdf There is a mechanism to review the GHG Emissions Reduction Plan annually and review the emissions reduction pathway, if required. However, it was identified that some of the defined approaches, timeframes and detailed targets are not established.
5.4 GHG Emissions Management	Conformance	The Entity establishes the procedure for the annual GHG emission calculation, and establishes, implements and maintains the energy ISO 50001:2018 certified Management System to improve energy consumption efficiency and reduce GHG emissions. The achievement status of the GHG reduction targets is reviewed periodically.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity utilises its Environment Management System and legal requirements to identify, assess, and quantify the Material Emissions to Air resulting from its activities. The Entity has implemented control plans to minimise exposure, and impacts from these emissions. The effectiveness of the control plans is monitored periodically, and control plans are reviewed regularly, and in case of any Major Changes or non-conformances. The Air Emission Control Plan is available at: http://jskuna.com/data/upload/202401/1704679083958820.pdf
6.2a-g Discharges to Water	Conformance	The Entity utilises its Environment Management System and legal requirements to identify, assess, and quantify the Material Discharges to Water from its activities. The Entity has implemented control plans to minimise exposure, and impacts from Material Discharges to Water. The effectiveness of the control plans is monitored periodically, and control plans are reviewed regularly, and in case of any Major Changes or non-conformances. The Wastewater Discharge Control Plan is available at: http://www.jskuna.com/data/upload/202401/1704679084389946.pdf

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an assessment of risk areas of their operations where Spills and Leakages may contaminate air, water and soil by following the risk assessment process of the Environmental Management System. The relevant emergency response plan is established and implemented. The Entity reviews the plans periodically and if needed after a Spill/Leakage event, or when there is a major change in Business.</p> <p>The latest version of the Spills and Leakage Risk Assessment Report and Emergency Response Plan for environmental accidents are available at:</p> <p>Leakage/Leakage Risk Identification and Risk Evaluation List: http://jskuna.com/data/upload/202401/1704679084508472.pdf</p> <p>Emergency Response Plan for Environmental Emergencies: http://jskuna.com/data/upload/202401/1704679086172284.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has defined the process to report the Spills/Leakages in the Emergency Response Plans including informing affected populations and organisations. No Spills or Leakages have occurred since 2022. Relevant information is publicly disclosed in the Operation Compliance Declaration at: http://jskuna.com/data/upload/202401/1704679086804547.pdf.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is managed under the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates the Material impacts through the recycling of waste where possible. The disposal of Hazardous Waste complies with applicable legal requirements. The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Waste generated from its activities at: http://jskuna.com/data/upload/202401/1704679085128312.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and documented its water use by source and type as part of the Environmental Impact Assessment. The Entity has assessed water-related risks taking into consideration the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures, the risk is low. There are no Material significant water-related risks in the Entity's Area of Influence. The Water Resources Risk Assessment Report is available at: http://www.jskuna.com/data/upload/202401/1704679084108942.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as water-related risks are identified as low. The Entity has an existing management plan for Wastewater.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Biodiversity and Ecosystem Services Risk and Impact assessment is included in the Environmental Impact Assessment, which was conducted by qualified third parties, and the report is approved by the local Environment Protection Agency. The approved EIA Report confirmed that there are no Biodiversity-sensitive areas within the Entity's Area of Influence, and therefore the risk has been determined as low. The Biodiversity and Ecosystem Services Risk and Impact Assessment Report is available at: http://jskuna.com/data/upload/202401/1704679084916706.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as there are no significant risks and potential impacts identified according to the Environmental Impact Assessment Report approved by the local environment protection agency. No Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as there are no significant risks and potential impacts identified according to the Environmental Impact Assessment Report.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as there are no Priority Ecosystem Services identified.
8.4 Alien Species	Conformance	The Entity has assessed the risks of introducing Alien Species in its operations and logistics activities and assessed if the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The result showed the risk is low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to not explore or develop New Projects or make Major Changes in World Heritage Properties. This commitment is included in the management manual. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	In the management manual, the Entity commits to protecting the environment. There are no Protected Areas in the Entity's Area of Influence based on the Official List of Protected Areas in China.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has developed a Business Code of Conduct, affirming its commitment to uphold Human Rights, promote gender equality, and adhere to the UN Guiding Principles on Business and Human Rights. The Entity has consistently published the Human Rights Impact Assessment Report which includes details on the approach taken to engage with affected communities and the mechanisms for resolving complaints. Based on the annual Human Rights Impact Assessment Report, records from management review meetings, and Stakeholder

CRITERION	RATING	COMMENT
		<p>grievance records, the Entity's operations have not resulted in, nor contributed to any significant adverse Human Rights impacts. However, should any negative impacts on Human Rights be identified or reported, the Entity has committed to provide appropriate remedies or cooperate through legitimate processes.</p> <p>The ASI Code of Conduct is available at: http://jskuna.com/data/upload/202401/1704679084171494.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established and implemented a comprehensive management procedure to protect female employees, demonstrating its commitment to uphold and promote gender equity and women's empowerment.</p> <p>The Entity gender equity policy is available via the Human Rights Impact Assessment Report available at: http://www.jskuna.com/data/upload/202401/1704679084717253.pdf</p> <p>The performance in safeguarding the rights of female Worker information is available in the 2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf</p> <p>No complaints relating to gender equity have been received within the past three years.</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations. However, the Entity has established and implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations. However, the Entity has developed a stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for all New Projects and significant modifications to existing projects.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.</p>
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity has established a process to identify and assess cultural and sacred heritage sites and aims to minimise any potential impact on these sites. Currently, all new and existing projects of the Entity have undergone Environmental Impact Assessments and Social Assessments. Through these assessments, it has been determined that there are no sacred or cultural heritage sites within the Area of Influence of the Entity.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.</p>

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9.6a-i Displacement	Not Applicable	The Criterion is not applicable, as no New Projects have been developed since it joined ASI. Local authority approval is required for any project development. No resettlements are required as all existing projects are within an industrial zone that was developed by the government. However, the Entity has established new project investment development management procedures, all project development must be approved by the local authority.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a Stakeholder engagement process to actively identify and address the primary concerns of the affected population and organisations. To effectively respond to these concerns, the Entity has developed a range of plans. These plans are regularly reviewed on an annual basis, and any necessary improvements are identified and implemented. The Entity's performance in executing these plans and actions is disclosed in the Annual Sustainability Report, available at: http://jskuna.com/data/upload/202401/1704679085198446.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established and implemented a comprehensive Management System, that includes a supply chain policy with clearly defined responsibilities and allocated resources, as well as information gathering mechanisms and active engagement with suppliers. The Entity's commitment to responsible sourcing is included in the Supplier Code of Conduct and the Stakeholder Complaint Handling Procedure. The Purchasing Policy and the grievance channel are available at: Purchasing Policy: http://www.jskuna.com/data/upload/202401/1704679085184257.pdf Stakeholder Complaint Handling Procedures: http://jskuna.com/data/upload/202401/1704679085337993.pdf Supplier Code of Conduct: http://jskuna.com/data/upload/202401/1704679084214004.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity conducts regular risk assessments to identify and evaluate potential risks within its supply chain. It is important to note that the Entity does not utilise conflict minerals and ensures that no materials are sourced from Conflict-Affected and High-Risk Areas. The Entity is committed to addressing critical Human Rights issues, such as Child Labour and Forced Labour, and ensures that these issues are not present within its supply chain. However, it was identified the Entity did not conduct an audit based on their Due Diligence practices for a new supplier.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a conflict minerals and supply chain management program and commits to taking actions including suspension of engagement, returning goods, and imposing penalties to eliminate the risk of using conflict minerals within its supply chain. Based on the risk assessment, no conflict minerals are used, no materials are sourced from any Conflict Affected and High-Risk areas, and there are no critical Human Rights issues such as Child Labour and Forced Labour. The Entity will continue to identify and assess these risks on an annual basis.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	As part of its commitment to responsible sourcing, the Entity conducts regular audits of its supply chain to assess compliance with the Code of Conduct. This ASI Performance Standard Re-Certification Audit includes the Entity's Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	It has been identified that the Entity has not reported on relevant information and performance related to supply chain Due Diligence, in particular conflict materials.
9.9 Security practice	Conformance	All security guards are sourced from an external provider. There are Policies in place to ensure that no body searches are performed, and security guards are expected to undertake their duties in a humane manner. Comprehensive training is provided to all security guards to ensure they understand their responsibilities and the importance of respecting Human Rights. It is worth noting that no grievances or complaints have been received regarding the conduct of security activities so far, indicating a positive track record in this regard.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as Freedom of Association and Collective Bargaining is restricted or limited in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's Senior management commits to respect the right of Freedom of Association and Collective Bargaining. Workers' representatives are freely elected by employees every three years. A worker representative congress meeting is regularly held once a year where Workers' concerns are communicated and discussed with senior management. A Collective Bargaining Agreement is signed and approved.
10.2a Child Labour	Conformance	Child Labour is prohibited in China, where the legal minimum working age is 16 years old. The Entity has implemented a Policy to not use Child Labour and has developed and implemented a procedure for the protection of young Workers. There is no Child Labour or young Workers in the Entity.
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented a Policy of prohibition of Forced Labour including Human Trafficking. The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. There are no cases of illegal wage deduction, Debt Bondage, or other types of Forced Labour identified or reported. The Policy and implementation information are disclosed in the Entity's Code of Conduct and Annual Sustainability Report, available at:</p> <p>ASI Code of Conduct: http://jskuna.com/data/upload/202401/1704679084171494.pdf</p> <p>2022 Annual Sustainability Report: http://jskuna.com/data/upload/202401/1704679085198446.pdf</p> <p>The Entity has publicly disclosed its annual Modern Slavery Statement detailing their actions to address modern slavery: http://www.jskuna.com/data/upload/202401/1704679084653033.pdf</p>

CRITERION	RATING	COMMENT
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and no cases of Discrimination have been received. Recruitment advertisements and the training plan indicate the decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The interviewed Workers confirm they are treated equally by the Entity.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and their representatives is established. The communication channels are announced to Workers, where they can lodge complaints and raise their concerns regarding working conditions, resolution of workplace, and compensation issues without threat of reprisal, intimidation or harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies that state that harassment or bullying is not accepted. An information brochure has been developed and distributed to all employees. The Entity's Code of Conduct is clear on this issue and training on this issue is provided for all employees. ASI Code of Conduct: http://jskuna.com/data/upload/202401/1704679084171494.pdf
10.7a-c Remuneration	Minor Non-Conformance	All employees sign a labour contract with the Entity within their first month, which clearly states the job terms and what both parties are responsible for. Each party is issued a copy. The pay structure is clearly defined, and everyone is paid greater than the minimum wage. Overtime worked at the Entity complies with legal obligations, and mandatory allowances are provided to ensure all basic needs. All Workers are enrolled in the mandatory social insurance program. The payment of wages is documented and is paid on time via bank transfer on the 25 th of each month. However, it was identified the Entity did not obtain approval for flexible working hours. In 2023, five new office Workers signed contracts designated as being under the flexible working hours system.
10.8a-c Working Time	Conformance	All production workshops implement a two-shift rotation system with three teams, with the day shift from 08:00 to 19:00 and the night shift from 20:00 to 07:00 the next morning. Office staff work from 08:00 to 17:00, five days a week, totalling 40 hours per week. Working hours are recorded and monitored. All Workers' monthly Overtime does not exceed the legal monthly limit, and all Workers have one day off per week. A review of time records from 30 samples between June to November 2023 demonstrated the working day did not exceed eight hours on average.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their rights, and has established cooperation and communication channels with the Workers at all its production plants.

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity establishes, implements, maintains and continually improves its ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System. On-site observation, document review, management and worker interviews, demonstrated that the OH&S Management System is effective.</p> <p>However, it was identified that during occupational physical monitoring assessments undertaken in 2022, Workers who were exposed to ammonia were not given a lung function test.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity conducts regular reviews of its Occupational Health and Safety (OH&S) Management System to ensure legal compliance and to identify any control gaps. This review process includes an annual internal audit against ISO 45001:2018 and a management review. When any indication of a control gap is identified, a review is conducted to assess if potential corrective and/or preventive actions should be implemented.</p> <p>The Entity publicly discloses its OH&S performance for 2022: http://jskuna.com/data/upload/202401/1704679084817331.pdf</p> <p>However, it was identified the Entity has not undertaken a comparative analysis of its performance with other Businesses or identify leading and lagging indicators.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a system for Workers' consultation and participation in Health and Safety. Workers are encouraged to report their concerns or advice on OH&S issues via this system, or directly through their representative. Management will respond to the concerns and advice on OH&S issues from Workers, as required.</p>

ASI LIMITATION OF LIABILITY DISCLAIMER

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	6 February 2024	Initial Certification Audit – Full Certification