

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Luoyang Wanji Aluminium Processing Co.,Ltd

CERTIFICATE NUMBER

96

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CHINA QUALITY MARK
CERTIFICATION GROUP

DATE OF ISSUE

29 SEPTEMBER 2023

DATE OF EXPIRY

28 SEPTEMBER 2026

CERTIFIED SINCE

29 SEPTEMBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

Aluminium Stewardship Initiative Ltd
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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

Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main products include tank cover material, ring pulling Material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft packaging, medicine foil, etc. the main processes include rolling, straightening, trimming, annealing, slitting and packaging.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
ENTITY NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
CERTIFICATION SCOPE	Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main products include tank cover material, ring pulling Material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft packaging, medicine foil, etc. the main processes include rolling, straightening, trimming, annealing, slitting and packaging.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (29 – 31 July 2020)Surveillance Audit (15 – 16 March 2022)Re-Certification and Scope Change Audit (21 – 22 August 2023)
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">29 – 31 July 2020 (Initial Certification Audit)15 – 16 March 2022 (Surveillance Audit)21 – 22 August 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 September 2020 (Initial Certification Audit)25 April 2022 (Surveillance Audit)8 October 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (29 – 31 July 2020)</u></p> <p>The Audit Scope covered related activities and Facilities involved in the production process of aluminium strip and aluminium foil products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (15 – 16 March 2022)</u></p> <p>The audit scope covered related activities and Facilities involved in the production process of aluminium strip and aluminium foil products.</p> <p>Supply chain activities included in the audit scope:</p>

-
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the audit scope.

Surveillance Audit (21 - 22 August 2023)

The audit scope covered related activities and Facilities involved in the production process of aluminium strip and aluminium foil products. Supply chain activities included in the audit scope:

Supply Chain Activities included in the audit scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME

- 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

29 September 2023 – 28 September 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

29 September 2025

CERTIFICATE NUMBER

96



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

Luoyang Wanji Aluminium Processing Co., Ltd. is situated in Xin'an Industrial Cluster District, thirty-five kilometres west of Luoyang city, which is recognised as the "Millennium Imperial Capital, Peony Flower City". The company was established in July 2008 with a registered capital of 1.5 billion CNY and started operations in 2012. It covers an area of 900,000m² and has an annual capacity of 200,000 tonnes of aluminium coils/sheets and 30,000 tonnes of aluminium foil.

The Entity is a wholly owned subsidiary (wholly State-owned) of Wanji Holding Group, one of China's top five hundred enterprises. It has been recognised as "Top 10 National Aluminum Plate and Strip Enterprises", "China Aluminum Foil Innovation Award", "China Nonferrous Metal Industry Advanced Collective", "The first batch of national Green Factory", "Top 10 Aluminum Plate and Strip Enterprises in Henan", "The Single Champion Product Cultivation Manufacturing Enterprises in Henan Province", "The Head Goose Enterprise in Henan Province Manufacturing Industry", and "Henan Postdoctoral Innovation Practice Base". The Luoyang Wanji brand has been awarded "Top 500 Chinese Brands" and "China Well-known Trademark". Its products enjoy a worldwide reputation.

Luoyang Wanji Aluminium Processing Co., Ltd. adheres to the development concept of "Green, LP (Lean Production), Innovation, Low carbon, and Global". It currently combines production, education and research and is making progress in the application area of new energy, lightweight, new materials, Fast-moving consumer goods (FMCG), aluminum instead of plastic, aluminum instead of steel, etc. It has become an essential part of the lithium battery industry supply chain for the automobile industry and aluminum foil for power battery aluminum plastic film.

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	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Compliance Obligation Acquisition and Confirmation Control Procedure, and the General Management Office and the Safety and Environmental Protection Department are responsible for collecting applicable laws and regulations and evaluating the compliance situation, at least annually.
1.2 Anti-Corruption	Conformance	In accordance with the requirements of the Anti-Bribery Management Procedure, the Entity has formulated anti-Bribery Policies, established an anti-Bribery management team, and has established an anti-Bribery risk assessment team to organise an annual summary and evaluation of the implementation of anti-Bribery work.
1.3a-e Code of Conduct	Minor Non-Conformance	The Entity has implemented several Codes of Conduct, including environmental Codes of Conduct, social Codes of Conduct, and governance Codes of Conduct, which continue to operate effectively. However, it was identified the Entity had not publicly disclosed the Code at the time of the audit.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has defined environmental, social and governance policies in the ASI Management Manual and maintains documented information relating to the environment, Occupational, Health and Safety, ASI and social governance.
2.2a-c Leadership	Conformance	The Entity has appointed a senior executive as the ASI Management Representative, whose responsibilities are specified in the appointment letter. They are responsible for leading and implementing the guidelines established by the Entity to meet the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity's Environmental Management System is ISO14001 certified. The certificate certification scope includes the ASI Performance Standard Certification Scope.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has developed requirements for the Social Management System in the ASI Management Manual to manage the Social Management System with respect to Human Rights and Labour rights.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has established a Procurement Control Procedure established by the Entity are implemented in accordance with the Entity's ASI guidelines and addresses the procurement principles required for environmental, social and governance aspects. However, it was identified the Entity has not publicly disclosed its Procurement Control Procedures.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred. However, the Entity has established an ASI Management Manual which specifies the requirements for conducting Environmental, Social, Cultural, and

CRITERION	RATING	COMMENT
		Human Rights Impact Assessments for New Projects or major changes to existing Facilities. The Environmental and Occupational Health and Safety Evaluation and Control Procedure for New Projects has been formulated, which stipulates the requirements for the declaration, environmental impact and risk assessment and recording of New Projects.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities. However, they have established an ASI Management Manual, the Entity will identify and evaluate the environmental and social impacts that may be caused during the construction and operation of the new, reconstruction and expansion projects.
2.7a-f Emergency Response Plan	Conformance	<p>The relevant requirements for Emergency Response Plans are specified in the Entity's ASI Management Manual. The Entity has developed Emergency Preparedness and Response Control Procedures and developed Emergency Response Plans for various environmental, social and security emergencies.</p> <p>The Entity has confirmed and demonstrated that they can provide the Emergency Response Plan to Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Closure, Decommissioning and Divestment Control Procedure to address shutdowns and conversions due to their Force Majeure factors, considering significant adverse environmental, social and governance impacts in the process. The Department of Administration and Human Resources reviews these procedures for closure and re-commissioning every five years. A review of the shutdown management process is required following any changes to the Entity that result in changes in the nature and scale of environmental, social and governance risks, or when there are indications of Control deficiencies.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Merger and Acquisition Procedure, which includes requirements for preparation before implementation, various risks that may arise, and risk avoidance in transactions. When implementing Merger and Acquisition projects, environmental, social and governance factors are important considerations. There have been no Mergers and Acquisitions since the establishment of the ASI system.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has defined the necessary requirements for the process of closure, decommissioning, and divestment. Additionally, the Entity has developed a control procedure and working procedures. However, there have been no instances of closure, decommissioning, and divestment since the establishment of the ASI system.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity sets out the relevant requirements for Sustainability Reporting in their ASI Performance Assurance Manual, and has implemented policies, systems and procedures that meet Sustainability Reporting requirements. The Entity publicly discloses its governance practices and annual Sustainability Report:</p> <p>https://wanjigroup.com/home-newsinfo-cid-27-id-6873.html</p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	The Entity sets out the requirements for violations and liability in the ASI Management Manual. The Entity's non-compliance will reflect the ability of the Entity's management to ensure that their operations meet the corresponding performance requirements and determines compliance with relevant governance, environmental and social laws and regulations. For information on the Entity's non-compliance and liability, see the 2022 Public Disclosure in the Sustainability Report: https://wanjigroup.com/home-newsinfo-cid-27-id-6873.html
3.3a-c Payments to Governments	Conformance	The Entity sets out the relevant requirements for payments (legal and contractual) to the Government in the ASI Management Manual. The Entity has developed and implemented policies, systems, procedures, and processes that anti-Corruption requirements. This requirement is met through the deployment of transparency and anti-Corruption policies.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established procedures within the ASI Management Manual to manage Stakeholder complaints, appeals and information requests. The Integrated Management Department tracks requests and complaints and has resolution mechanisms. The general management department receives feedback and ensures they are assigned and responded to accordingly. The Entity reviews the procedures annually and has provisions to review the complaint resolution mechanism in case of Control deficiencies. They have established registration forms and publish contact information for enquiries, complaints, and appeals.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	As part of the identification of environmental factors, the environmental impact of the entire life cycle of Aluminium products has been considered. The Aluminium Life Cycle Environmental Impact Assessment Report has been developed and Life Cycle Impact Assessment has been undertaken.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has established an Environmental Factors Identification and Evaluation Control Procedure for the identification of environmental factors and environmental impact of the entire life cycle of Aluminium products. The Entity has developed an Aluminium Life Cycle Environmental Impact Assessment Report to provide Life Cycle Assessment (LCA) information to customers: https://wanjigroup.com/home-news-cid-27-page-1.html
4.2 Product Design	Conformance	The Entity has specified the relevant requirements for product design in the ASI Management Manual. The Design and Development Control Procedure establishes the LCA procedure as part of the product design process, which considers various environmental impacts, including energy, consumption, water, air emissions and waste. The Entity specifies the yield rate of the product, incorporates the design objectives, and implements the production process to ensure that these objectives are achieved whilst achieving sustainability requirements.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established the requirements for Aluminium process waste and targets in the ASI Management Manual. Targets have been set for the recovery, recycling or reuse of waste. At present, the waste

CRITERION	RATING	COMMENT
		recycling target is 100%, and the recycling and internal use is 100% remelting. The Entity has adequate and effective procedures for the sorting and treating of different types of Aluminium waste.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	As China does not currently have a national approach to aluminium recycling, the Entity does not have a recycling rate associated with local, regional or national collection and recycling systems. However, the Entity has established Policies and procedures for internal Aluminium recycling. Facilities have clear targets for the percentage of Aluminium recovered in the final product. At present, the waste recycling target is 100%, and the recycling and internal use is 100% remelting.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has specified requirements for disclosure of Greenhouse Gases (GHG) emissions and energy use in the ASI Management Manual. Starting from 2019, the Entity has undertaken annual verification activities on its GHG emissions, which are disclosed at: https://wanjigroup.com/home-newsinfo-cid-27-id-6872.html All publicly disclosed GHG emissions data by the Entity have been independently verified prior to disclosure.
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 developed a GHG emissions reduction plan consistent with the 1.5 degree warming scenario with specific actions, deadlines, and responsible personnel. Monitoring systems are included in the annual reporting process to assess progress. The emission reduction plan specifies specific actions and deadlines for implementation, including responsible personnel and production areas. GHG targets are communicated to internal and external Stakeholders for transparency. However, the Entity's 2023 Greenhouse Gas Emission Reduction Plan, which specifies the 2023 GHG Emissions Reduction Plan, targets, and energy-saving measures, is not publicly disclosed on their website.
5.4 GHG Emissions Management	Conformance	The Entity has established an Environmental and Occupational Health and Safety Operation Control Procedure and Environmental Monitoring and Measurement Control Procedure which includes provisions for the control and management of the GHG Emissions

CRITERION	RATING	COMMENT
		Reduction Plan and tests whether the actual performance of emission reductions has reached the emission reduction target.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>Pollutants in air emissions are quantified in emission permits. The Entity regularly monitors its Air emission status as required to meet local legal emission limits and is available in the Henan Provincial Department of Ecology and Environment, 'Automatic Monitoring and Basic Database System for Key pollutant discharge Units - Enterprise server' website: http://61.136.80.109:8080/amOnline/zdjk-company-base/login.</p> <p>It was identified the Entity however did not specify the review period of the Air Pollutant Emission Reduction Plan or specify under which circumstances under which the plan should be reviewed. It also has not publicly disclosed the Air Pollutant Emission Reduction Plan.</p>
6.2a-g Discharges to Water	Conformance	The Entity's water pollutants are quantified in discharge permits. The discharge status of water pollutants is monitored regularly according to the requirements, and the discharge meets the local legal discharge limits.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established an Emergency Plan for environmental emergencies that assesses the risk areas of air, water, and land pollution during production operations. In case of Leakage or Spills, an Emergency Plan is implemented based on the risk level. The soil is tested annually by a third party to ensure environmental quality. The Entity reviews the contingency plan every three years and after any leaks. The ASI Performance Assurance Manual reviews plans for Control deficiencies. There are no indications of Control defects currently. The latest version of the Emergency Plan has been filed with the Luoyang Ecological Environment Bureau.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's water pollutants are quantified in discharge permits. The discharge status of water pollutants is monitored regularly according to the requirements, and the discharge meets the local legal discharge limits.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed a Waste Management Procedure to publicly disclose the Hazardous Waste generated and related waste disposal methods annually in the National Solid Waste and Chemicals Management Information System (requires login credentials): http://61.136.80.109:8080/amOnline/zdjk-company-base/login</p> <p>The Entity evaluates the annual Hazardous Waste management plan through the National Hazardous Waste Identification Information public service platform annually. The Entity has established appropriate and effective procedures for the collection and disposal of all waste and has continuous improvement targets to reduce unit waste generation.</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.

CRITERION	RATING	COMMENT
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 declared and publicly disclosed the water consumption to 'Henan Water Resources', an agency supervised by the Xin'an County Water Resources Bureau: http://ystj.mwr.cn/zb/#/login?redirect=%2Fhome%2FenterpriseIndex</p> <p>The Entity has conducted an Environmental Impact Assessment for a previously completed construction project. The Entity has engaged a qualified third party to undertake a hydrological overview and regional water supply status assessment, indicating that the water source met the legal requirements, and the local Xin'an County Water Resources Bureau approved the Water intake License Water intake is approximately 300,000 cubic metres (m3) per annum, and the water source is groundwater.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, the Entity's risk assessment and documentation determined water-related risks to be low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Biodiversity Assessment Report 2022 includes the risks of land use and Business activities' impact on Biodiversity and concludes they are not located in any Protected Area, have no significant risks and impacts on Biodiversity and are assessed as having an overall low risk.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Priority Ecosystem Services located in its Area of Influence.
8.4 Alien Species	Conformance	The Entity conducts annual assessments of Alien Species and takes control measures for high-risk sources. No Alien Species have been introduced into the Entity's operations to date.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located in the industrial area of Xin'an County, Luoyang City, Henan Province, which is not a World Heritage site. And the Entity has committed not to explore or build New Projects at World Heritage sites.
8.6a-d Protected Areas	Conformance	The Entity is located in the industrial area of Xin'an County and is not in the list of protected areas in China. Any construction projects are subject to Environmental Impact Assessment in accordance with Chinese law.

CRITERION	RATING	COMMENT
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	<p>The Entity is committed to respecting Human Rights and has established a Human Rights Policy, incorporated as part of the ASI Social Management Policy at: https://wanjigroup.com/home-newsinfo-cid-27-id-6875.html</p> <p>The Entity has also developed a Human Rights Due Diligence Procedure that provides a methodology for identifying, preventing, mitigating and explaining how it addresses actual and potential impacts on Human Rights. The General Office organises an annual survey on the Human Rights situation and the potential impact of developing a Human Rights Due Diligence record. The Human Rights approach is reviewed at the time of indications of Control deficiencies and followed by an updated Human Rights Policy.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has formulated the Procedures for the Protection and Management of Female Employees, committed itself to protecting the legitimate rights and interests of women, and established guidelines for the protection of Women's Rights and interests. The Entity has set up a trade union women's federation to protect Women's Rights and interests and holds various activities on "International Working Women's Day" every year to ensure gender equality and Women's Rights.</p> <p>Through its website, the Entity publicly disclose their projects or activities, ensuring that Women's Rights and interests are legally respected: https://wanjigroup.com/home-newsinfo-cid-27-id-7160.html</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples present where the Entity operates. However, the Entity has established an Indigenous Protection Procedure to determine the types of Indigenous Peoples in a location and their interests in terms of customs, land, resources, etc.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples present where the Entity operates.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples present where the Entity operates.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established and implemented procedures for the management of cultural sites and religious shrines in order to take timely and appropriate protective measures if impacted. The Entity's 'Indigenous and Heritage Sites Survey Record' was checked to confirm there are no surrounding cultural sites and religious sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples present where the Entity operates.
9.6a-i Displacement	Conformance	At present, no resettlement projects have been undertaken since the establishment of the Entity. The Entity has established resettlement procedures whereby when New Projects are designed, the Entity prioritises viable alternatives to avoid or minimise the displacement of populations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented a Stakeholder Management Procedure which is reviewed every five years. There is no land use, or other conflicts between the Entity and the surrounding villages. Control measures have been developed and implemented in response to identified impacts on Local Communities. To date, no complaints have been received by the Entity from the Local Community. The Entity has a good relationship with the Local Community as nearly 50 percent of employees reside locally. The Entity has developed a plan to support the surrounding community and has made donations.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established an ASI Performance Standards Manual that outlines the procedures to annually review for operations or direct suppliers of raw materials in Conflict-Affected and High-Risk Areas, to not participate in the conflict directly or through its Business relationships and to conduct Due Diligence and risk assessment if the supplier sources its raw materials from the relevant regions.</p> <p>According to the Entity's 2023 Qualified Suppliers List, hot rolled coils are mainly sourced from a third-party Trader, which is an indirect purchase. This Trader is from Zhengzhou, Henan Province, China, there are no materials from CAHRAs.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted Due Diligence on suppliers and Traders. Manufacturers supplying the Traders were not located in conflict and high-risk areas. The Entity has established a Commitment not to use Conflict-Affected Minerals, and to not use any raw materials from conflict-affected countries.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a Commitment not to use Conflict Affected Minerals and has implemented supply chain management activities to ensure the legitimacy and security of raw material sources.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The implementation of the procurement control procedures is reviewed annually by the Entity in conjunction with the internal audits of the ISO14001:2015 and ISO45001:2018 Management Systems.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity's Sustainable Development Report provides information on Supplier Due Diligence, available at: https://wanjigroup.com/home-news-cid-27.html
9.9 Security practice	Conformance	The Entity has implemented its internal Security Management Regulations, which define the management responsibilities of security guards and provide training to security personnel to ensure that all security personnel understand their mandate and the manner in which they respect Human Rights. To date, no complaints or complaints regarding security have been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, 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 has established a Procedure for the Management of Freedom of Association and the Right to Collective Bargaining which provides for the right of all persons of the entity to freely form, join and organise Trade Unions and to engage in Collective Bargaining on behalf of themselves and the Entity. The Entity has established Trade Union organisations in accordance with the laws of China and allows Workers to freely choose their own Workers' representatives when the Freedom of Association and Collective Bargaining Rights of Trade Unions are restricted by local laws. When necessary, the Entity is obligated to assist departments in electing their employee representatives, who are responsible for monitoring and raising issues related to safety, health, welfare and social management with the Entity's management.
10.2a Child Labour	Conformance	<p>The Entity has established and implemented Child Labour and underage Labour Management Procedures to prohibit the use of Child Labour and eliminate the employment of Child Labour and underage labour. There is no child or underage labour at the Entity.</p> <p>In future, if the Entity recruits underage Workers between 16 and 18 years old, if they choose to continue their education the Entity will support this. Young Workers (16 to 18 years of age) are specially protected by law and are not allowed to work in dangerous working conditions.</p>
10.3a-c Forced Labour	Conformance	The Entity has established a 'Management Procedure for the Prohibition of Forced Labor' to eliminate forced and Forced Labour and strictly abide by the relevant provisions of the Labor Law. The Entity does not require any form of security deposit or deposit from employees, nor does it restrict the freedom of movement of Workers in the workplace or on-site housing, and does not hold any original documents, such as ID cards, passports, or qualification certificates. The Entity only retains copies of ID cards and graduation certificates in personal files in accordance with ASI Standards and manual document requirements. The Entity's Modern Slavery Statement is available at: https://wanjigroup.com/home-newsinfo-cid-27-id-7110.html
10.4a-c Non-Discrimination	Conformance	The Entity has developed and implemented a non-Discrimination Management Procedure, has established an effective monitoring

CRITERION	RATING	COMMENT
		<p>mechanism and adopted a Human Rights Due Diligence process to ensure that the principle of non-Discrimination is implemented in all Business activities. The Entity has established a performance appraisal system, which distributes employees' performance fairly and equitably according to the appraisal, and does not discriminate against employees based on age, gender and job type. The Entity has also facilitated training, communications and complaint channels, and developed a culture of non-Discrimination throughout the Entity.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a 'Consultation, Communication and Information Exchange Management Procedures' and encourages employees to participate in the ASI Management System. The Entity maintains direct contact with employees and representatives of the production safety Management Committee if there are any issues. The feedback communication mechanism of respondents and channels has been established and functioning well. Records including completed 'Complaint Handling Registration Form' and 'Information Exchange Registration Form' are maintained.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a 'Management of Punitive Measures' procedure which was developed in consultation with Workers and their representatives. The Entity prohibits the use of corporal punishment, coercion, Harassment, and gender-based Violence, including sexual Harassment. Employees can provide feedback and complaints regarding unfair treatment. The Policy undergoes an annual internal audit and management review, with provisions for updates when necessary. The relevant procedures are available on the Entity website at: https://wanjigroup.com/home-newsinfo-cid-27-id-7159.html</p> <p>The Entity's administration and human resources departments manage employee feedback and complaints.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has established a 'Wage Management' procedure, which requires that when employees are employed, both parties sign the Labor Contract, and their employment conditions and salary are explained. The Entity pays its employees a standard wage no less than the minimum standard set by the local government. The employee receives a wage sufficient to meet the basic needs of the employee, and the Entity also ensures that wages and benefits are in full Compliance with all Applicable Laws and paid in a form that is convenient for employees. Workers are paid Overtime allowance for all Overtime in accordance with state regulations. The Entity does not unreasonably deduct wages for disciplinary purposes, requiring monthly wage payments.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Laws and industry standards regarding working hours and public holidays. The standard working week (excluding Overtime) does not exceed 40 hours according to the law. The Entity adheres to statutory holidays and pays annual leave as stipulated by the State. Employees are entitled to at least one day off for every six consecutive days of work. Overtime work is entirely voluntary and may not exceed 12 hours per week. The Entity implements four shifts and three operations (working 8 hours, rest 24 hours).</p>

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their Rights and obligations, via documentation and through other means such as letters, webmail, phone calls, and interviews. Whilst Freedom of Association and Collective Bargaining is restricted by relevant laws in China, the Entity fulfils their obligation to inform employees of their Rights through staff congresses and Trade Unions.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented the Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has developed management manuals and procedures that are available to employees and related parties. Employees and related parties are trained to understand and comply with OH&S requirements. The Entity reviews the management manuals and systems via a management review when there are indications of Control deficiencies. The Entity publicly discloses the performance of its OH&S Management System on its website at: https://wanjigroup.com
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an effective mechanism to collect feedback from employees on OH&S. The Workers' Congress meets with Workers on an irregular basis and relevant records have been retained since its inception.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 September 2020	Initial Certification Audit – Full Certification
1	12 May 2022	Surveillance Audit
2	21 December 2023	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.