

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NANJING CHERVON AUTO PRECISION TECHNOLOGY CO., LTD.

CERTIFICATE
NUMBER

348

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV SÜD

DATE OF ISSUE

21 FEBRUARY 2024

DATE OF EXPIRY

20 FEBRUARY 2025

CERTIFIED SINCE

21 FEBRUARY 2024

AUTHORISED BY

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Production and sale of key automotive components
at the Nanjing Chervon Auto Precision Technology
Co., Ltd. facility in Nanjing, China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Nanjing Chervon Auto Precision Technology Co., Ltd.
ENTITY NAME	Nanjing Chervon Auto Precision Technology Co., Ltd.
CERTIFICATION SCOPE	Production and sale of key automotive components at the Nanjing Chervon Auto Precision Technology Co., Ltd. facility in Nanjing, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">● Casthouses● Semi-Fabrication● Material Conversion (Industrial Users)
ASI STANDARD	Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">● Initial Certification Audit
AUDIT FIRM	TÜV SÜD
AUDIT DATE	13 March – 17 October 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">● 28 November 2023
AUDIT SCOPE	<p>The audit scope covers the Nanjing Chervon Auto Precision Technology Co., Ltd facility in Nanjing, China.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">● Casthouses● Semi-Fabrication● Material Conversion (Industrial Users) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">● Provisional 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.

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- ☑ 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 21 February 2024 – 20 February 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 20 August 2024

CERTIFICATE NUMBER 348

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established a process to monitor, identify and ensure compliance with Applicable Law and customer requirements. The Entity's Legal Department is responsible for the identification of Applicable Law and its assessment at least annually, which covers labour, ethics, health and safety and environmental issues.</p> <p>Training is provided for relevant employees at least twice per year. Compliance audits are conducted by clients, with the latest conducted in June 2022.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established a system, including the implementation of ethics procedures, which address Bribery, Corruption, antitrust and conflicts of interest. There is no identified risk or evidence of Bribery or obtaining undue or improper advantage being promised, offered, authorised, given or accepted.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct which addresses environmental, social and governance performance. The Code of Conduct is communicated with employees, suppliers and other Stakeholders.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established an environmental, social and governance Policy as part of its Management System. The Entity has obtained ISO 14001, ISO 45001, ISO 5001 and ISO14064 certificates.</p> <p>The Policy is disclosed on-site and communicated with Workers and is available on the Entity's website.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's senior management are committed to the implementation of the Management Systems. A Management Representative has been appointed with responsibility for the Entity's Policies that address labour, ethics, health and safety and environment. The effectiveness of the Management System is reviewed during annual management reviews.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has established an ASI Performance Standard Manual, which includes relevant Environmental, Social and Governance (ESG) Policies and Procedures and is communicated internally via on-site posts and the internal website as well as externally to clients and suppliers.</p> <p>Training is also provided for relevant employees.</p>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity's Vice General Manager has been appointed as the Management Representative with responsibilities being defined in a letter of appointment. This role also is responsible for the effective provision of resources required to establish, implement, maintain and improve the Entity's Management Systems.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established and implemented an Environmental, Health and Safety (EHS) Management System that has been endorsed by the executive management. The EHS Management Manual has been endorsed by the EHS Supervisor. The Entity has obtained ISO 14001 certification of their Management System: www.chervonauto.com/web/toStaticHtml?type=5 Internal audits and management reviews of the EHS Management System are conducted.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented its Social Responsibility Management Manual and procedures for conducting risk assessments, internal audits and management review of the Social Management System.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a responsible sourcing Policy, which has been communicated with its suppliers. The Entity has also undertaken supplier assessments in accordance with its Supplier Management Procedure. The Policy is reviewed at least every five years or upon any significant changes to the Business. However, the Entity has not yet conducted on-site assessments for all of its suppliers.
2.5 Impact Assessments	Conformance	The Entity has undertaken Impact Assessments addressing Human Rights, environmental, health and safety and social responsibility at least annually. The Entity's risk assessment procedures address the requirement for Environmental and Social Impact Assessments for New Projects or Major Changes to existing Facilities. The Environmental and Social Impact Management Plan is reviewed every five years or when a significant change occurs. A Corrective Action Plan (CAP) is developed and implemented for any non-conformance identified. The Human Rights and Environmental and Social Impact Assessment is disclosed on the Entity's website.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has developed Emergency Response Plans (ERP) which are based on the risk assessment that addresses crisis organisation, communication guidelines and business recovery plans. An Emergency Response Team (ERT) has been established and trained. The ERP is registered with the local bureau and communicated with the Local Community. Drills relating to the implementation of the ERP are performed annually.
2.7 Mergers and Acquisitions	Conformance	Mergers and acquisitions are managed at a group level by Chervon Group. The Due Diligence process is also managed and organised by Chervon Group. Group procedures are relevant for the Entity. There have been no mergers or acquisitions related to the Entity in the past three years.
2.8 Closure, Decommissioning and Divestment	Conformance	Closures, decommissioning and divestment activities are managed at a group level by Chervon Group. Procedures and investigations are established for the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and implemented Policies, procedures and processes that conform to the sustainability reporting requirements and has established a communication procedure for communication with Stakeholders including the government on environmental, social and economic impacts. The Entity prepared both a 2021 Corporate Social Responsibility Report (not publicly disclosed) and a 2021 Annual Report which discloses its governance approach and Material ESG issues, refer pages 33-56: http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfqL.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the sustainability reporting requirements. Information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law is disclosed in the 2021 Annual Report: http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfqL.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has publicly disclosed its governance approach which stipulates that it only makes, or has

CRITERION	RATING	COMMENT
		made on its behalf, payments to governments on a legal and/or contractual basis. It has developed and implemented Policies and Procedures to address anti-Corruption requirements, including the Anti-Corruption and Anti-Bribery Policy.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established a Stakeholder Grievance Mechanism and communication process to address complaints, grievances and requests for information from internal and external Stakeholders. Further information is available in the 2021 Annual Report: http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfqL.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted Life Cycle Assessments (LCA) for its major Products, which was determined based on sales volumes. To date, the LCA only addresses the Products' carbon footprint.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has implemented its LCA Procedure and developed LCAs, consistent with ISO 14040 and ISO 14044, for its major Products. The LCA certificates (ISO 14067) are available at: www.chervonauto.com/web/toStaticHtml?type=5 http://www.chervonauto.com/web/toNewsDesc?newId=76
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's LCAs for its major Products are available at: www.chervonauto.com/web/toStaticHtml?type=5 http://www.chervonauto.com/web/toNewsDesc?newId=76
4.2 Product design	Conformance	The Entity has established procedures for LCA in the Product design process, and the LCA is required to consider various environment impacts including energy, material consumption, water, air emissions and waste. To date, GHG emissions have been integrated into the design process.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets for managing Process Scrap. The objectives and targets are issued for each process and are reviewed monthly. The Entity has implemented a procedure for the classification and disposal of the different types of

CRITERION	RATING	COMMENT
		Aluminium Scrap. Scrap is recycled and monitoring records are maintained to demonstrate recycling rates.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established clear targets for Process Scrap. The targets are issued for each process and are reviewed monthly. The Entity separates Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has informed its clients about the opportunity to influence recycling rates through Product design and by providing additional information on the Product. The Entity has established a recycling plan, including specific timelines, activities and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has informed its clients on potential opportunities to influence recycling rates through Product design and by providing additional information on the Product. The Entity has established a recycling plan, including specific timelines, activities and targets.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity communicates its GHG (Greenhouse Gas) Emissions and energy reduction achievements in its annual Social Responsibility Report (accessible for employees and clients). Data are verified by a Third Party. A GHG emissions management Procedure with a documented methodology for determining Material GHG Emissions and energy use by source has been established.</p> <p>However, the Entity's GHG Emissions data are not adequately disclosed and the data does not differentiate Direct and Indirect GHG Emissions.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has established GHG Emissions reduction targets, which are communicated to employees via the Social Responsibility Report. A summary of this Report is publicly available at: http://www.chervonauto.com/web/toNewsDesc?newId=76</p> <p>Improvement programs to reduce both Direct and Indirect GHG Emissions have been established and the Entity regularly reviews its progress.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	<p>The Entity's Emissions to Air are monitored annually and the emissions inventory by source and type are published in the 2021 Annual Report, page 53-56:</p> <p>http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfqL.pdf</p> <p>The Entity has established a procedure with a documented methodology for the monitoring and management of Emissions to Air. Calibration records for instrumentation used for monitoring emissions are maintained. A risk assessment associated with air emissions and air quality to determine effects on humans and the environment is conducted annually.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has established a wastewater inventory to control Discharges to Water. Industrial wastewater is collected as a Hazardous Waste and transferred by a third party. Domestic wastewater is treated at the Entity's internal wastewater treatment plant before discharge into the local municipal system. A documented procedure has been established addressing the management and monitoring of its wastewater discharges. The Entity's wastewater data by source and type are published in the Annual Report, page 53-56:</p> <p>http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfqL.pdf</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has engaged a qualified third party to assess the risks of Spills and Leakages and to develop Emergency Response Plans (ERP). These Plans have been approved by local bureau. Site observations confirmed control measures have been appropriately implemented for the identified potential risks. No Spills or Leakages have been reported.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has implemented a Spills and Leakages Management Plan, which is reviewed at least every three years or upon any significant change. Corrective action plans are developed as required.</p>

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6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an Emergency Response Plan (ERP), which addresses the reporting of Spills and Leakages to affected parties, emergency organisations and the local bureau. The ERP has been registered and approved by the local bureau.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented an Emergency Response Plan (ERP), which addresses the reporting of Spills and Leakages. Management actions associated with Spills and Leakages is disclosed in the publicly available summary of the Entity's internal Corporate Social Responsibility Report: http://www.chervonauto.com/web/toNewsDesc?newId=76
6.5a Waste management and reporting (strategy)	Conformance	The Entity's Waste management procedure addresses the process for receiving, storing, dispensing and disposal. The Entity has implemented processes to appropriately collect and dispose all Waste and has developed continual improvement targets to reduce Waste generation per unit. Targets are reviewed quarterly by the management team. The impact of waste on people and the environment is also assessed annually. Hazardous Waste is collected and treated by qualified companies and Waste Transfer Reports are recorded on the government platform.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's Waste management procedure addresses the publication of Waste management information. Waste information is disclosed in the 2021 Annual Report and the publicly available summary of the Social Responsibility Report: http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-04-28/603982_20220428_6_sqFRXfgL.pdf and http://www.chervonauto.com/web/toNewsDesc?newId=76
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.

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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.
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 has implemented a Dross management procedure that addresses the collection and recycling of Aluminium Dross. Dross is collected and sent to a qualified company for treatment and recycling. Dross manifests and shipping papers are maintained. Training is provided for employees in the handling and collection of Dross.
6.8b Dross (recycling)	Conformance	The Entity has implemented a Dross management procedure that addresses the collection and recycling of Aluminium Dross. Dross is collected and sent to a qualified company for treatment and recycling. Dross manifests and shipping papers are maintained.
6.8c Dross (review of alternatives)	Conformance	The Entity's Dross is collected and sent to a qualified company for treatment and recycling for use in other products such as construction materials. Dross is not disposed to landfill. The Entity has annually performed on-site audits at the recycling company to ensure Dross residues are not landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has assessed its water consumption as part of the Environmental Impact Assessment (EIA) and in development of its environmental emergency

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		plans. The most recent water balance assessment was conducted in 2022. The EIA has determined that the Entity's water source is compliant with legal requirements and approved by the local bureau.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks as part of the EIA, which determined the risk as low.
7.2a Water management (management plans)	Conformance	The Entity has established annual water use reduction targets and implemented programs to achieve these targets.
7.2b Water management (monitoring)	Conformance	The Entity has established annual water use reduction targets and implemented programs to achieve the targets. The targets and progress of the programs are reviewed monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity has implemented a procedure to address the publication of water management information, including water-related risks and control programs. Water data are disclosed at: http://www.chervonauto.com/web/toNewsDesc?newsId=76
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has established a procedure with a documented methodology for determining the Materiality of impacts on Biodiversity from its land use and activities within its Area of Influence. The Biodiversity assessment is addressed in the EIA, which included affected peoples and external Stakeholders and was prepared by a third party. A further Biodiversity assessment was conducted in October 2023.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has established action plans for Biodiversity management, approved by the local environment bureau during the EIA approval process. A revised action plan has been established and the Entity has prepared internal and external reports to support ongoing management actions. Affected personnel and external stakeholders (government and community) have been consulted, informed and trained on the management plans and controls. Relevant information is disclosed on the Entity's website: http://www.chervonauto.com/web/toNewsDesc?newsId=76

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8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established action plans for Biodiversity management, which has been approved by the local environment bureau during the EIA approval process. A revised action plan has been established and the Entity has prepared internal and external reports to support ongoing management actions. Affected personnel and external Stakeholders (government and Community) have been consulted, informed and trained about the management plans and controls.
8.2c Biodiversity management (reporting)	Conformance	The Entity has established a procedure for the disclosure of Biodiversity risks and management outcomes. Relevant information is disclosed in the summary of the Entity's Corporate Social Responsibility Report, available at: http://www.chervonauto.com/web/toNewsDesc?newId=76
8.3 Alien Species	Conformance	The Entity has assessed the risk of introduction of Alien Species, which determine the risk is low. Biodiversity action plans have been implemented.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has committed to respecting Human Rights and has implemented its Code of Conduct. The Entity has identified the risk of Human Rights and provides training for all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Social Responsibility Manual and implemented processes that seek to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. No negative issues have been identified during supplier audits, including the Social Management Questionnaire.

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9.1c Human Rights Due Diligence (remediation)	Conformance	No negative Human Rights issues have been identified via the Entity's Due Diligence processes nor the complaints/grievance mechanism.
9.2 Women's Rights	Conformance	The Entity has implemented a Gender Equity and Women's Empowerment Policy to address the respect for the legal rights and interests of women including issues such as voting and being elected, education, employment, promotion, and maternity health. No complaints have been received by Workers and interviews confirmed Workers are satisfactory with working conditions at the Entity.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in areas where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites or values impacted by the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, as resettlement has not been required.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, as resettlement has not been required.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an ASI Performance Assurance Manual to address the legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity is located within an industrial park. The Entity is in close contact with surrounding Communities and some employees reside in the local area. Environmental protection devices, including an air emission treatment facility is in operation to reduce the impact to the surrounding communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with surrounding Communities and some employees reside in the local area. The Entity has established plans to support the surrounding communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has developed a procedure for the management of conflict minerals, which stipulates that Aluminium in the Products they manufacture

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		are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Due Diligence Guidance) or an equivalent and recognised Due Diligence framework. Due Diligence on suppliers' management of conflict minerals has been undertaken and suppliers have signed commitment letters. A whistleblowing channel is also provided if required.
9.9 Security practice	Conformance	Security at the Entity is provided through a security services company. Security guards are trained on Human Rights and they commit to respect Human Rights in accordance with recognised standards and good practices.
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, as it complies with the Applicable Law in China regarding the Freedom of Association and right to Collective Bargaining. The Entity has implemented its Social Responsibility Manual to respect the Workers' rights to freely associate in Labour Unions.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China regarding the Freedom of Association and right to Collective Bargaining. The Entity has implemented its Social Responsibility Manual to respect the Workers' rights to Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for Workers. A Workers' council has been established and Worker representatives are freely elected and have access to undertake their duties.
10.2a Child Labour (minimum age)	Conformance	The Entity neither engages in, nor tolerates the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law. The youngest Worker at the Entity is 18 years.
10.2b Child Labour (hazardous)	Conformance	The Entity neither engages in, nor tolerates the use of Child Labour, including Hazardous Child Labour. The youngest Worker at the Entity is 18 years.
10.2c Child Labour (worst forms)	Conformance	The Entity neither engages in, nor tolerates the use of Child Labour, including the Worst Forms of Child

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		Labour. The youngest Worker at the Entity is 18 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, including slavery and Human Trafficking. No type of Forced Labour was identified at the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All Workers are employed directly by the Entity and no deposit, fee, or advance is required from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in Forced Labour. There are no Migrant Workers at the Entity. The Entity has established a procedure that states the Entity does not require deposits or payments from any Workers, either local or Migrant.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour. The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt, as confirmed during Worker interviews.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' movement at the site, as confirmed during Worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. The Entity does not hold Workers' original documents, passport or permits, only copies of identification documents are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. Workers are free to terminate their employment contract with reasonable notice, and the time for announced termination is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has implemented its Code of Conduct and Human Rights Policy, which ensure equal opportunities regarding hiring, salary, promotion, and training, and does not allow Discrimination based on gender, race, national origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Workers are provided training on Discrimination and can access the Entity's grievance channel to report concerns if required.
10.5 Communication and engagement	Conformance	The Entity has implemented a Communication and Participation Procedure to ensure open

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		communication with Workers and their representatives regarding working conditions.
10.6 Disciplinary practices	Conformance	The Entity has implemented a Harassment and Abuse Management Procedure, which addresses the Entity's disciplinary procedures and the prohibition of Harassment and abuse in all its forms. The procedure ensures there is no threat of retaliation, intimidation, harassment and no deduction of wages used as disciplinary practices.
10.7a Remuneration (living wage)	Conformance	Workers are paid an hourly rate and the Entity's records demonstrate that the minimum wage meets the local legal requirements. Workers are paid for Overtime work based on their basic wage, 150% on weekdays, 200% on rest days, and 300% on statutory holidays. The Entity provides social insurance for Workers under a labour contract. For labour hire Workers, the Entity retains records of its four labour hire providers that demonstrate social insurance is provided for labour hire Workers.
10.7b Remuneration (method of payment)	Conformance	Wages are paid to employees in the local currency via bank transfer on the 10 th day of the following month.
10.8 Working Time	Major Non-Conformance	The normal Working Time at the Entity is 8 hours per day, 40 hours per week. The Entity has a comprehensive working hour system waiver that defines the total annual working hours at 2,432 hours. Documentation review and Worker interviews confirmed that Overtime is voluntary. However, approximately 70% of the sampled employees exceeded the working hour limit over a one year period of September 2022 - 2023, with a maximum of 3,009 hours. The weekly working hours exceeded 60 hours, with a maximum of 70 hours in August and September 2023. Also, it was identified that some Workers had worked 13 consecutive days.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established a formal Policy on Occupational Health and Safety (OH&S), under its ISO 45001:2018 certified Management System, and communicated it with relevant Stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented its OH&S Policy and related procedures to ensure all Workers and

CRITERION	RATING	COMMENT
		Visitors follow internal OH&S rules by means of orientation training and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented its OH&S Policy with commitment to comply with Applicable Law on Workers' health and safety, international standards, and the ILO Conventions on Occupational Health and Safety including, where relevant, ILO Conventions 155 and 176.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented its OH&S Policy which includes the right to stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented its ISO 45001:2018 certified Management System and has established adequate procedures for OH&S control.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented an Environment, Health and Safety Committee, which holds regular meetings to understand the health and safety conditions at the factory and promote the development of OH&S engagement at the Entity.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance during management reviews, which includes the use of lagging and leading indicators in its comparison benchmarking.

Document Control and Version History

Revision	Date	Notes
0	21 February 2024	Certification Audit - Provisional Certification The audit was undertaken over two audit periods (13 – 16 March 2023 and 15 – 17 October 2023).