ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ZOUPING HONGFA ALUMINUM TECHNOLOGY CO., LTD.

CERTIFICATE NUMBER

243

ASI STANDARD

PERFORMANCE STANDARD (V2 2017)

DATE OF EXPIRY

19 DECEMBER 2022 18 DECEMBER 2025

CERTIFICATION LEVEL

FULL CERTIFICATION ASI ACCREDITED AUDITOR

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

19 DECEMBER 2022

AUTHORISED BY

DATE OF ISSUE

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia info@aluminium-stewardship.org

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

All activities of Zouping Hongfa Aluminum
Technology Co., Ltd. (Binzhou City, Shandong
Province, China), which is mainly engaged in
technical research and development, production and
sales of Aluminium alloy rolled products, and its
wholly owned subsidiary Zouping Dingrui Renewable
Resources Co., Ltd. (Binzhou City, Shandong
Province, China), which is mainly engaged in the
processing and treatment of metal scrap and
recycling of productive metal scrap. Both facilities
are in Binzhou City, Shandong Province, China.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	China Hongqiao Group Co., Ltd.
ENTITY NAME	Zouping Hongfa Aluminum Technology Co., Ltd.
CERTIFICATION SCOPE	All activities of Zouping Hongfa Aluminum Technology Co., Ltd. (Binzhou City, Shandong Province, China), which is mainly engaged in technical research and development, production and sales of Aluminium alloy rolled products, and its wholly owned subsidiary Zouping Dingrui Renewable Resources Co., Ltd. (Binzhou City, Shandong Province, China), which is mainly engaged in the processing and treatment of metal scrap and recycling of productive metal scrap. Both facilities are in Binzhou City, Shandong Province, China.
SUPPLY CHAIN ACTIVITIES	Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V2
AUDIT TYPE	 Initial Certification Audit (9 – 12 October 2022) Surveillance Audit (15 – 16 April 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	 9 – 12 October 2022 (Initial Certification Audit) 15 – 16 April 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	21 November 2022 (Initial Certification Audit)14 May 2024 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (9 – 12 October 2022) The Audit Scope includes activities of Zouping Hongfa Aluminum Technology Co., Ltd., which is mainly engaged in technical research and development, production and sales of Aluminium alloy rolled products, which mainly include high-end products such as PS and CTP plate bases for

modern thermal printing, can materials and Aluminium foil blanks. The main processes include casting, hot rolling, cold rolling and finishing. The wholly owned subsidiary Zouping Dingrui Renewable Resources Co., Ltd., which is

mainly engaged in the processing and treatment of metal scrap and recycling of productive metal scrap, and the main processes include remelting and alloy production.

Supply chain activities included in the audit scope:

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

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

Surveillance Audit (15 – 16 April 2024)

The Audit Scope includes activities of Zouping Hongfa Aluminum Technology Co., Ltd., which is mainly engaged in technical research and development, production and sales of Aluminium alloy rolled products, which mainly include high-end products such as PS and CTP plate bases for modern thermal printing, can materials and Aluminium foil blanks. The main processes include casting, hot rolling, cold rolling and finishing. The wholly owned subsidiary Zouping Dingrui Renewable Resources Co., Ltd., which is mainly engaged in the processing and treatment of metal scrap and recycling of productive metal scrap, and the main processes include remelting and alloy production.

Supply chain activities included in the audit scope:

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

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

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY	The Auditors confirm that:
DECLARATION	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	19 December 2022 –18 December 2025
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	18 December 2025

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity collects and identifies the applicable legal requirements and other requirements, and conducts a compliance evaluation on an annual basis.	
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption established by the mother company Shandong Hongqiao New Material Co., Ltd are well implemented. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Training is provided to all employees.	
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance which is established by the mother company Shandong Hongqiao New Material Co., Ltd. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct, pages 3-8: http://www.hongqiaochina.com/Uploads/File/2024/04/11/">http://www.hongqiaochina.com/Uploads/File/2024/04/11/ http://www.hongqiaochina.com/Uploads/File/2024/04/11/ http://www.hongqiaochina.com/Uploads/File/2024/04/11/ http://www.hongqiaochina.com/Uploads/File/2024/04/4/ http://www.hongqiaochina.com/Uploads/File/2024/04/4/ http://www.hongqiaochina.com/Uploads/File/2024/04/4/	

CRITERION	RATING	COMMENT
		establish, implement, maintain, and continually improve the Management System.
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	The Policies established by the mother company of Shandong Hongqiao New Material Co., Ltd are available to internal Stakeholders and external Stakeholders via the website: http://www.hongqiaochina.com/Uploads/File/2024/04/1 1/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6% 8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%A B%E9%9C%B2%EF%BC%882022%EF%BC%89.202 40411150131.pdf (page 17-19). However, Workers did not receive adequate training on the ASI requirements.
2.2 Leadership	Conformance	A senior Management Representative has been nominated, and is supported by a team from the Human Resources, EHS, Quality and Purchasing departments. The responsibility and authority of each department and key roles are defined.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System. One of the sites holds a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity's Purchasing Policy is communicated to all suppliers and Contractors and covers the Material environmental, social and governance aspects for suppliers based on the ASI Performance Standard.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for any New Projects or Major Changes to existing facilities.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001: 2018 certificates. The Entity has well-established Emergency Response Plans developed in collaboration with potentially affected Stakeholder groups such as communities, Workers and their representatives, and relevant agencies. The Emergency Response Plans on Social, OH&S and

CRITERION	RATING	COMMENT
		Environmental Accidents are well implemented, and personnel are trained, as verified during the audit.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions. No such activity has occurred since the Entity commenced operation in 2015.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. No such case has occurred since the Entity commenced operation in 2015.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity reports via the Annual ESG Report 2022 of the Group Company China Hongqiao Group Co., Ltd and is available at: http://www.hongqiaochina.com/Uploads/File/2023/04/2 1/3.20230421171705.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has not received any non-conformances from local authorities as disclosed in the ESG Report: http://www.hongqiaochina.com/Uploads/File/2023/04/21/3.20230421171705.pdf
3.3a Payments to governments (legal and contractual)	Conformance	Payments to government are disclosed in the finance report of the Group Company China Hongqiao Group Co., Ltd which is audited by a third party. The financial report is available at: http://www.hongqiaochina.com/Uploads/File/2023/04/21/1.20230421171016.pdf
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 an internal and external whistleblowing/complaints/Grievance Mechanism that includes a 'whistleblower' hotline, mailing address, suggestion box, and QR code.
PRINCIPLE 4 MATERIAL STEW	ARDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its Aluminium sheet and strip products, pages 23-28: http://www.hongqiaochina.com/Uploads/File/2024/04/2 4/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6% 8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%A B%E9%9C%B2%EF%BC%882024%EF%BC%89.202 40424074008.pdf

CRITERION	RATING	COMMENT	
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has publicly communicated cradle-to-gate LCA information and its underlying assumptions, including system boundaries.	
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has made available its environmental Life Cycle Assessment Report at: http://www.hongqiaochina.com/Uploads/File/2024/04/2 4/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6% 8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%A B%E9%9C%B2%EF%BC%882024%EF%BC%89.202 40424074008.pdf (pages 23-28)	
4.2 Product design	Conformance	The Entity has integrated relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the End Product. For each product development process, energy consumption, the use of clean energy, waste reduction and recycling are taken into consideration. The targets for these relevant aspects have been defined.	
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and the target for the collection, recycling and/or reuse of scrap, is 100%. Process scrap is collected and sent to a smelter for recycling.	
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented processes to separate Aluminium alloys and grades for recycling.	
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities and targets. The Entity is communicating with the main customer to discuss how to improve the recycling rate of products at End of Life.	
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no local, regional or national collection and recycling systems for Aluminium scraps in China. The Entity works with the customer to decide how to improve the recycling rate of products at End of Life.	
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS			
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has calculated its major Scope 1 and 2 Greenhouse Gases (GHG) Emissions and energy use by source and disclosed the data in the 2023 GHG Emissions Report, pages 3-19, available at: http://www.hongqiaochina.com/Uploads/File/2024/04/24/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F%91%E9%93%9D%E4%B8%9A%E7%A7%91%E	

CRITERION	RATING	COMMENT
		6%8A%80%E6%9C%89%E9%99%90%E5%85%AC %E5%8F%B8ASI%E4%BF%A1%E6%81%AF%E6% 8A%AB%E9%9C%B2%EF%BC%882024%EF%BC %89.20240424074008.pdf GHG Emissions are not currently verified by a Third Party.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target to reduce GHG emissions from 0.73 CO ₂ per tonne of product in 2021 to 0.62 tonne CO ₂ per tonne of product by 2025. The main strategy is to reduce electricity consumption and increase the scrap recycling rate. The GHG Emissions reduction target, page 2, is available at:

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil, has been undertaken by following the risk assessment process for the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the Emergency Response Plan for environmental incidents in which the control methods for the identified Spill or Leakage are defined. The required Spill management facilities are in good order. The Entity has provided training on the plan to the relevant Workers and has conducted emergency drills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has defined the requirement to report Spills and Leakages in the Emergency Response Plan, which also addresses responsibilities and the reporting process. No Spills occurred in 2023 or 2024.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a process to ensure Impact Assessments associated with Spills and Leakages and the remedial actions taken are disclosed. No Spills or Leakages occurred in 2023 or 2024. The Entity has published the annual Environmental Performance Report 2023, pages 29-33: http://www.hongqiaochina.com/Uploads/File/2024/04/24/24/24/24/24/24/24/24/24/24/24/24/24
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The inventory of wastes generated in the operation is established and control methods for the different types of waste are defined. The main Hazardous Wastes are diatomite with oil and waste oil such as rolling oil and mineral oil. The disposal of Hazardous Waste complies with legal requirements and is transferred to qualified suppliers for disposal. Each transfer is registered with the Environment Protection Ministry. The transfers in 2023 and 2024 were audited and no non-compliance was found.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and the associated waste disposal methods are disclosed in the annual

CRITERION	RATING	COMMENT
		Environmental Performance Report, pages 29-33: http://www.hongqiaochina.com/Uploads/File/2024/04/2 4/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F%91%E9%93%9D%E4%B8%9A%E7%A7%91%E6%8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%AB%E9%9C%B2%EF%BC%882024%EF%BC%89.20240424074008.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 Aluminium recovered from the Dross pressing is recycled in the Entity's melting furnaces. The remaining is sold to external processers for recycling, which is used to produce Aluminium alloying ingots and cement materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the Dross pressing is recycled in the Entity's melting furnaces for recycling the Dross residues. The remaining is sold to external Dross processers for recycling, which is used to

CRITERION	RATING	COMMENT	
		produce Aluminium alloying ingots and cement materials.	
6.8c Dross (review of alternatives)	Conformance	There is no Dross residue sent to landfill.	
PRINCIPLE 7 WATER STEWARE	DSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use. The Entity only sources water from the municipal water supply and identifies the discharge and consumption source. The water balance analysis has been conducted.	
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment which considered the Entity's Area of Influence, and water-related risk was identified as low. The water risk assessment report, pages 26-38: http://www.hongqiaochina.com/Uploads/File/2024/04/1 1/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6% 8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%A B%E9%9C%B2%EF%BC%882022%EF%BC%89.202 40411150131.pdf	
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.	
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.	
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its Water Resources Risk Assessment report, pages 26-38: http://www.hongqiaochina.com/Uploads/File/2024/04/1 1/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6%8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%AB%E9%9C%B2%EF%BC%882022%EF%BC%89.202 40411150131.pdf	
PRINCIPLE 8 BIODIVERSITY			
8.1 Biodiversity assessment	Conformance	The Biodiversity assessment is included in the Entity's Environmental Management System. The assessment involved qualified Third Parties and the report was approved by the local Environmental Protection Bureau. The risk and impact were assessed as low. Further information is available in the Biodiversity Risk Assessment Report, pages 20-25:	

CRITERION	RATING	COMMENT	
		http://www.hongqiaochina.com/Uploads/File/2024/04/1 1/%E9%82%B9%E5%B9%B3%E5%AE%8F%E5%8F %91%E9%93%9D%E4%B8%9A%E7%A7%91%E6% 8A%80%E6%9C%89%E9%99%90%E5%85%AC%E5 %8F%B8ASI%E4%BF%A1%E6%81%AF%E6%8A%A B%E9%9C%B2%EF%BC%882022%EF%BC%89.202 40411150131.pdf	
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.	
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.	
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.	
8.3 Alien Species	Conformance	The Entity has identified the risk of introducing Alien Species within its Biodiversity Risk Assessment Report. It is limited to the use of wooden pallets and they are processed in a way to avoid the introduction of Alien Species.	
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
PRINCIPLE 9 HUMAN RIGHTS			
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has an ASI Policy that addresses its commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.	
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Due Diligence process to identify and assess the risks and impacts on Human Rights. The requirements of the ASI Performance Standard are communicated to suppliers and major	

CRITERION	RATING	COMMENT
		supplies are audited to verify conformance with the requirements.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channels to Stakeholders. A remediation process for any adverse Human Rights impact has been established. No major impact has been reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected by the Entity. The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy has been established and communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. However, Policies and processes to ensure respect for the rights and interests of Indigenous Peoples have been established.
Not Applicable	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence. However, Policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) have been established.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no cultural or sacred heritage sites. However, Polices and a procedure to protect cultural and sacred heritage have been established.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there has been no resettlement. All land was purchased from the local government, and there are no expansion plans. However, the Entity has established a management procedure for resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there has been no resettlement. All land was purchased from the local government, and there are no expansion plans. However, the Entity has established a management procedure for resettlements.
9.7a Local Communities (rights and interests)	Conformance	The control measures for any identified impacts on Local Communities have been established and

CRITERION	RATING	COMMENT
		implemented. No complaints from The Local Communities have been received. The Entity is active in community engagement and provides a positive impact on the communities.
9.7b Local Communities (impacts)	Conformance	The control measures for any identified impacts on Local Communities have been established and implemented. No complaints from The Local Communities have been received. The Entity is active in community engagement and provides a positive impact on the communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests. The Entity is active in community engagement and provides a positive impact on the communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity conducts regular risk assessments to identify and evaluate potential risks within its supply chain, which has determined that no conflict minerals are used, and no materials are sourced from Conflict-Affected and High-Risk-Areas (CAHRAs). All supplies are sourced from domestic producers.
9.9 Security practice	Conformance	The Entity commits in its involvement with public and private security providers, to respect Human Rights in line with ASI Standards and good practices. The management procedure for on the job duties of security Workers clearly defines their primary role is to protect people, property and or assets and to respect Human Rights.
PRINCIPLE 10 LABOUR RIGHTS	5	
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable as there are laws that restrict Freedom of Association in China.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable as there are laws that restrict Collective Bargaining in China.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Whilst there are laws that restrict Freedom of Association and Collective Bargaining in China, the Entity has demonstrated they respect Freedom of Association and Collective Bargaining. Workers have freely elected representatives, including one woman, and the representatives can deal with the Workers' concerns with management on behalf of the Workers.

CRITERION	RATING	COMMENT
		Workers can also report their concerns and complaints via email, the hotline or by directly communicating with management.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. There is no Child Labour or young Workers in the Entity. The age of candidates is verified by checking identity cards and through interviews.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour including Human Trafficking. The Policy is communicated internally and to suppliers.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour. Workers are not required to provide any form of deposit, Recruitment Fees or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers at the Entity and approximately 5% of Workers are internal Migrant Workers from other provinces. The Entity's management procedure on the prohibition of Forced Labour and the Code of Conduct are implemented through training and periodical internal checks. No deposits or security payments are required from Workers at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans to Workers. Labour contracts signed between the facilities and Workers do not include terms related to Debt Bondage, and payslips indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an Employee Manual that defines there is no restriction on Workers' movement at the Entity. This was verified through interviews with Workers.

CRITERION	RATING	COMMENT	
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has defined within the management procedure on Forced Labour and the Employee Manual, that the retention of original documents is prohibited. Only copies of original documents are kept in Workers' files.	
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of the employment is in compliance with the Labour Contract Law, which is thirty days' notice in advance or three days' notice during the probation period.	
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. No case of Discrimination has been received. Recruitment advertisements and training plans indicate there is no Discrimination during hiring or provision of training opportunities. The interviewed women workers confirm that they feel equal with male colleagues.	
10.5 Communication and engagement	Conformance	The Entity has regular meetings between Worker representatives and senior management, a grievance and complaints hotline, and has implemented operating procedures to ensure communication and direct engagement with Workers regarding working conditions and resolution of workplace and compensation issues.	
10.6 Disciplinary practices	Conformance	The Entity respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of the involved Worker. The Entity does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers.	
10.7a Remuneration (living wage)	Minor Non- Conformance	The Entity's wage structure is clearly defined, and the basic wage meets the legal minimum wage. The total payment meets Workers' basic needs. However, on average the Overtime wage for one out of every 41 Workers is currently lower than the legal requirement.	
10.7b Remuneration (method of payment)	Conformance	All payments are documented and made to all Workers by bank transfer near the first day of the following month, seven days after the wage cycle.	
10.8 Working Time	Minor Non- Conformance	Working hours are recorded manually and are monitored. however two cases were identified where the benefits of paternity and parental leave were insufficient.	
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY			

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy, which is reviewed periodically and communicated with Stakeholders. The Entity holds a valid ISO 45001:2018 certification and no non-conformities were raised in the most recent audit.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to Workers and Visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has implemented systems to identify all applicable legal and related requirements and evaluate legal compliance at least annually.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers receive training to understand the workplace hazards, OH&S risks, relevant actions and their right to refuse unsafe work. The Entity has measures in place to protect Workers from any consequences for stopping unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certification.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in health and safety, in conformance with ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&S issues independently, or to a Worker representative. The management responds to the concerns and advice from Workers on OH&S issues.
11.4 OH&S performance	Conformance	The Entity has established and documented four OH&S targets in the OH&S Program. The achievement status of the targets is monitored periodically. Currently, the implementation of the management programs for the OH&S targets is on track.

Document Control and Version History

Revision	Date	Notes
0	19 December 2022	Initial Certification Audit – Full Certification
1	12 June 2024	Surveillance Audit