

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NINGBO TUOPU GROUP CO., LTD. LIGHT ALLOY SYSTEM 9TH UNIT

CERTIFICATE
NUMBER

302

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

3 AUGUST 2024

DATE OF EXPIRY

2 AUGUST 2027

CERTIFIED SINCE

3 AUGUST 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a horizontal line.

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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

Manufacturing aluminium auto parts at Ningbo Tuopu Group Co., Ltd Light Alloy System 9th Unit which is located at No.59, Guanhai Road, Beilun, Ningbo, China. The processes include casting, semi-processing, aluminium remelting/refining, and material conversion.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ningbo Tuopu Group Co., Ltd.
ENTITY NAME	Ningbo Tuopu Group Co., Ltd. Light Alloy System 9th Unit
CERTIFICATION SCOPE	Manufacturing aluminium auto parts at Ningbo Tuopu Group Co., Ltd Light Alloy System 9th Unit which is located at No.59, Guanhai Road, Beilun, Ningbo, China. The processes include casting, semi-processing, aluminium remelting/refining, and material conversion.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (27 – 30 March 2023)Surveillance Audit (26 February – 29 March 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">27 – 30 March 2023 (Initial Certification Audit)26 29 February – 29 March 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 June 2023 (Initial Certification Audit)7 April 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (27 – 30 March 2023)</u></p> <p>The audit scope covers the manufacturing aluminium auto parts at Ningbo Tuopu Group Co., Ltd Light Alloy System 9th Unit which is located at No.59, Guanhai Road, Beilun, Ningbo, China. The processes include casting, semi-processing, aluminium remelting/refining, and material conversion.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/ RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)

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

Surveillance Audit (26 February – 29 March 2024)

The audit scope covers the manufacturing aluminium auto parts at Ningbo Tuopu Group Co., Ltd Light Alloy System 9th Unit which is located at No.59, Guanhai Road, Beilun, Ningbo, China. The processes include casting, semi-processing, aluminium remelting/refining, and material conversion.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	3 August 2024 – 2 August 2027
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	2 August 2025
CERTIFICATE NUMBER	302

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a process to control Compliance with Applicable Laws, regulations and other requirements. It has integrated the latest laws, regulations and other requirements into training materials which have been communicated to all employees, Contractors and visitors.
1.2 Anti-Corruption	Conformance	The Entity has established a business ethics policy/procedure, covering anti-Bribery, Corruption and gift principles and related training has been provided to all employees. The Entity conducts a risk assessment annually and Due Diligence on business ethics and no Material risks have been identified.
1.3 Code of Conduct	Conformance	The Entity has established an ASI Performance Standard (PS) Management Manual which includes the principles related to environment, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a Management System for environmental, social and governance compliance. The Entity's ASI Policies are available in the 2022 Sustainability Report, page 8: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has established environmental, social and governance Policies which are endorsed by the CEO. Annual management review meetings are held to review the Policies and performance of the Entity's ASI PS Management System.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the ASI Policies to internal employees through initial orientation and annual refresher training. The Policies are included in the Sustainability Report, page 8: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has established an ASI PS Management Organisation Chart to implement the system, and the responsibilities and authorities are defined in ASI PS Management Manual. The System Manager is appointed as the ASI Management Representative who is responsible for implementing the ASI Management System.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environment Management System certified to ISO14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established a social Management System. A risk assessment procedure, internal audit control procedure and management review control procedure are established to review the effectiveness of the social Management System, the latest internal audit was conducted in August 2023. For non-conformances identified during internal audits, the Entity conducts a root cause analysis and implements corrective and preventive actions.
2.4 Responsible Sourcing	Conformance	The Entity has implemented responsible sourcing activities by ensuring suppliers sign ASI commitment letters, conducting supplier assessments and emphasising to its suppliers to implement the ASI Standards. The Audit verified this through the review of relevant supplier KPI (Key Performance Indicator) monthly review records and supplier audit reports. The Entity's Responsible Sourcing Policy is included in the 2022 Sustainability Report, page 12: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
2.5 Impact Assessments	Conformance	The Entity conducts Social Accountability Risk Assessments, which address the impacts of social, cultural and Human Rights for all New Projects and Major Changes to the Facility. The latest one was conducted in April 2023, and no Material risk was identified. The environmental impact analysis is undertaken as part of the Entity's ISO14001 certified Management System.
2.6 Emergency Response Plan	Conformance	The Entity has developed specific Emergency Response Plans in collaboration with potentially affected Stakeholder groups such as the Local

CRITERION	RATING	COMMENT
		Communities, Workers, the Fire Bureau and the Environment Bureau. The Entity has conducted emergency drills according to the frequency as defined in these Plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger and acquisition control procedure, which includes a Due Diligence process to be conducted before any merger or acquisition. In the past three years, no mergers or acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closure, decommissioning and divestment control procedure. No such case has occurred during the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed the governance approach and its Material environmental, social and economic impacts in the 2022 Sustainability Report, available at: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity publishes non-compliance issues (such as significant fines, judgement, penalties, and non-monetary sanctions) in the 2022 Sustainability Report, page 30: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf In the past three years, one penalty was issued to the Entity, which related to occupational health. The Entity has since implemented adequate and effective corrective actions for the relevant non-conformances.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes to ensure payment to the government is legal and reasonable. The Entity has hired a qualified third party to undertake the annual financial audit. The 2022 Sustainability Report outlines that all the payments to the government are based on legal law or contracts, such as social insurance fees, business tax, and housing fund fees. The Entity has

CRITERION	RATING	COMMENT
		disclosed the payments to governments in the 2022 Sustainability Report, page 30: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.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 implemented a process to manage internal and external complaints, which takes into consideration cultural and gender-sensitive impacts. Employees can report complaints and grievances using the suggestion boxes, email (tuopu@tuopu.com , yajie.wang@tuopu.com), via their worker representatives or the hotline (0574-56582888, +86-13586517034) These communication channels have been communicated to all employees during training and posters onsite. For external Stakeholders, reporting channels include a hotline (0574-56582888) and email (tuopu@tuopu.com), which are publicly disclosed in the 2022 Sustainability Report, page 10: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf No external complaint or grievance has been received in the past year. The internal records confirm that the complaints and grievances received have been resolved with the acceptance of the complainant.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has established a process and system to conduct Life Cycle Assessments (LCA). The Entity prepared an LCA report, developed in accordance with both ISO14040:2006 and ISO14044:2006, for its main Products in January 2022.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	The Entity's LCA report for its main Products is available in the 2022 Sustainability Report, pages 14-16: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf

CRITERION	RATING	COMMENT
		<p>%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</p> <p>However, the current LCA information only addresses environmental impacts using a gate-to-gate approach, and as such the impacts within the supply chain are not considered (cradle to gate) in the assessment.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity's LCA report is available in the 2022 Sustainability Report, pages 14-16: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</p> <p>The public LCA information includes the underlying assumptions and system boundaries.</p>
4.2 Product design	Conformance	<p>The Entity has established procedures for LCA in its Product design process, the LCA shall consider various environment impacts including energy consumption, water, air emission and waste. At present, in the design phase, all the environment factors of LCA have been identified and listed in the final design reports and quantifiable data for each factor is determined and continuous improvement objectives have been established.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has developed targets and improvement programs for each process to reduce Aluminium Process Scrap during production. 100% of Scrap is recycled and sold to a recycling vendor. The Scrap generated rate is reviewed monthly to ensure the targets are met.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has implemented procedures including an Aluminium Scrap management program to classify and manage the different kinds of Aluminium Scrap. At present, only one Aluminium alloy is used by the Entity and therefore segregation is not required in the collection process.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has implemented a Policy for the collection and recycling of Products at End of Life and has established a recycling strategy, including specific timelines, activities, and targets. The activities include the purchase of Recycled Aluminium ingots with a target for at least 30% of Products to contain Recycled Aluminium by 2028, and progress is reviewed annually.</p>

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	There are no local, regional or national collection and recycling systems in the location of the Entity. The Entity has issued a Policy to increase recycling rates in their markets for their Products containing Aluminium and has developed plans to cooperate with customers and recycling companies. However, there is no detailed program for the recycling of Products at End of Life pertaining to the product designing process and the Entity's participation in social activities related to recycling of Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published its Greenhouse Gas (GHG) emissions data in its annual Sustainability Report, pages 20-22: https://www.tuopu.com/wp-content/uploads/2023/03/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf The GHG emissions calculation is performed by internal experts, with the GHG source inventory and raw data provided for verification. During 2022, a total of 162,657.71 tonnes of CO ₂ was emitted.
5.2 GHG emissions reductions	Conformance	The Entity has established a target to reduce CO ₂ emissions by 0.5% in 2023, against 2022 data, and has established improvement programs to achieve the target. At present, its major GHG generation sources are material transportation, electricity and natural gas, and the source of electricity is 100% coal-fired. The management team annually reviews the progress. All the related data is tracked and reviewed monthly. The reduction plan and target are published in the annual Sustainability Report, pages 20-22: https://www.tuopu.com/wp-content/uploads/2023/03/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	Minor Non-Conformance	<p>The Entity has a process to manage air emissions in accordance with its Environment Impact Assessment (EIA) and Pollution Discharge Registration (PDR) requirements. Monitoring is performed annually by a qualified third party and no exceedance of threshold limit values was observed. The Entity has established annual continual improvement objectives for waste air emissions and the objectives are reviewed monthly. To achieve the targets, the Entity has implemented improvement programs. The Entity's air emission data is disclosed in the annual Sustainability Report, page 18:</p> <p>https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</p> <p>However, the air emission monitoring does not include all waste air outlets.</p>
6.2 Discharges to Water	Minor Non-Conformance	<p>The Entity has a process to manage wastewater in accordance with its EIA and PDR requirements. Monitoring is performed monthly by a qualified third party and no exceedance of a threshold limit has been detected. The Entity has established annual continual improvement objectives for wastewater and the objectives are reviewed monthly. The Entity's wastewater management information is disclosed in the annual Sustainability Report, page 18:</p> <p>https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</p> <p>However, the wastewater monitoring in September 2023 did not include all the elements as required by the legally mandated EIA.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has conducted leakage assessments annually and the latest assessment was undertaken in January 2024. No Material risks have been identified, and the Entity has taken preventive actions/improvement programs for all the potential risks.</p>

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted leakage assessments annually and the latest assessment was in January 2024. No Material risks have been identified, and the Entity has taken preventive actions/improvement programs for all the potential risks. Emergency Response Plans for Spills and Leakage are established and the ERP is registered with the local environment bureau.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established an Emergency Response Control Process that defines how to dispose of and report Spills. If there is a Spill, the Emergency Response Team (ERT) would follow the response process to deal with it accordingly. Drills are conducted annually to ensure the process is up to date. The process includes the immediate notification to all affected parties including neighbours, Local Communities, and government authorities.
6.4b Reporting of Spills (regular reporting)	Conformance	No Spills were reported in recent years. Should a Spill occur, information would be disclosed in the in the Sustainability Report, page 30: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has identified all the waste generated by its processes. A solid waste and Hazardous Waste inventory are established to track the sources and disposal of each type of waste. All the waste is disposed of by qualified vendors and the Entity has regularly monitored the compliance of governance, social and environment. The storage and daily maintenance of Hazardous Waste complies with legal requirements. The Entity has established a continual improvement program to reduce generation of waste and the program and associated targets are reviewed monthly.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's waste management information is included in the 2022 Sustainability Report, page 19: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf

CRITERION	RATING	COMMENT
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 Entity has implemented a Scrap Management Procedure that defines the process to collect and recycle Aluminium Dross. At present, 100% Dross is transferred to a vendor to extract the Aluminium.
6.8b Dross (recycling)	Conformance	The Dross generated by the Entity is transferred to a vendor to extract the Aluminium. According to monitoring records by the Quality Assurance (QA) Department, the vendor extracts Aluminium from the Dross, which is then sold to their customers. The Entity reviews the management of Dross recycling monthly and seeks improvement to reduce the generation of Dross.
6.8c Dross (review of alternatives)	Conformance	The Entity does not landfill Dross. 100% Dross is transferred to a vendor to extract the Aluminium.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has assessed its water consumption using a qualified third party via the Environmental Impact Assessment (EIA) reports when the factory was founded, which indicated the water source is compliant with legal requirements and approved by local Environment Protection Bureau. The Entity has established water mapping and regularly reviews the updates and changes. A water risk assessment is conducted annually, and the latest assessment determined that there is no Material risk.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments annually, and include the Entity's Area of Influence. No Material risks have been identified. In 2023, 15,090 tonnes of water is used. The water source is local municipal water plant, and no underground, river or lake water is sourced.
7.2a Water management (management plans)	Conformance	The Entity has implemented annual targets to continually reduce water consumption and has established programs to achieve them.
7.2b Water management (monitoring)	Conformance	The Entity has implemented annual targets to continually reduce water consumption and has established programs to achieve them. The targets and progress are reviewed monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage and risks in the 2022 Sustainability Report, pages 23-25: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity conducted a Biodiversity assessment as part of its EIA reporting, which was conducted by a qualified third party and approved by the government. No Material negative impacts have been identified. The Entity is located in a government-managed industrial zone.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determine that there are no Material impacts on Biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determine that there are no Material impacts on Biodiversity.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determine that there are no Material impacts on Biodiversity.
8.3 Alien Species	Conformance	The Entity annually assesses risks related to Alien Species and no Material risks have been identified.
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 established a Policy with respect to Human Rights. The Policy is included in the 2022 Sustainability Report, page 6: https://www.tuopu.com/wp-content/uploads/2023/10/2022%E5%B9%B4%E6%8B%93%E6%99%AE%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity's Due Diligence Management Procedure requires annual Human Rights Due Diligence. The most recent Human Rights Due Diligence was conducted in November 2023 and covered the Entity’s internal activities, suppliers, communities and other Stakeholders, with 95% of key Stakeholders included.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established its Due Diligence Management Procedure to manage any identified adverse Human Rights impacts. A hotline (0574-56582888) and email (tuopu@tuopu.com) are available for Stakeholders to raise concerns. No adverse impacts have ever been reported and as a result remediation is not required. If any remedial action is required, the Entity will develop remediation and corrective actions according to the Procedure.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	The Entity has established a Code of Conduct regarding Discrimination and Harassment. The Entity respects the rights and interests of women and develops activities to support work-life balance. Female Workers do not work in hazardous positions, which is prohibited by law. Women are paid the same as men for their work. The Entity also provides adequate protection for pregnant Workers and facilities for nursing mothers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the 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 the areas where the Entity operates. The Entity is located in a Government-managed industrial zone.
9.5 Cultural and sacred heritage	Conformance	Through on-site observation, confirmation via the EIA, and its industrial zone location, the Entity has determined that it does not have any impact on cultural or sacred heritage sites or values.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has established a resettlement management procedure that requires them to consider feasible alternatives to avoid or minimise physical and/or economic displacement, whilst also considering environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women during the project design process. The EIA report confirms that no resettlements are/were required. The Entity has confirmed that there are no resettlements expected to occur in future.
9.6b Resettlements (where unavoidable)	Conformance	Where physical displacement is unavoidable, the resettlement management procedure requires the Entity to establish a detailed resettlement plan with affected parties consistent with IFC Performance Standard 5 - Land Acquisition and Involuntary Resettlement. However, the Entity has confirmed that there are no resettlements expected to occur in future.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an ASI PS Management Manual and Local Communities Management Procedure. The Entity has also implemented communication channels for Local Communities. No complaints have been received by the Local Community.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The Entity is located in an industrial zone and the nearest community is located approximately one kilometre from the Entity. Some employees (approximately five percent) are from this local area. The EIA report indicates that the Entity has installed environmental protection devices, including air emission treatment facilities to reduce the impact on the surrounding communities. The Entity has also established an Emergency Response Plan (ERP), where Local Communities are engaged in the ERP.
9.7c Local Communities (livelihoods)	Conformance	Approximately five percent of the Entity's employees are from the Local Community. The Entity has established a plan to support surrounding Communities, such as providing employment opportunities and supporting public events.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established ASI PS Management Manual, which includes a Procedure that outlines its commitment to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). Both the Due Diligence investigation reports and signed supplier commitments confirm that no materials are sourced from these areas.
9.9 Security practice	Conformance	The Entity has established a Security Management Regulation with respect to Human Rights. All security staff receive training on the Human Rights Policy and procedure with annual refreshers also provided. This training includes anti-harassment, anti-abuse and anti-Forced Labour. All security practices on site are undertaken in accordance to the Entity's Human Rights commitments.
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 relevant Applicable Laws in China.
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 relevant Applicable Laws in China.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity respects the rights of Workers according to its Policy and procedure, and expects the same of its suppliers. The Entity has one Labour Union that Workers can join voluntarily. Worker representatives are elected democratically and are

CRITERION	RATING	COMMENT
		<p>treated the same as other Workers. Interviews with Workers confirm that the Entity does not interfere with the Union's activities. Workers' representatives are elected democratically by all Workers, whom address the Workers' concerns with management on behalf of Workers. The Worker representatives deal with management on behalf of Workers, and they negotiate all employment conditions with the Entity. The employee manual is approved by the worker representatives.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has implemented processes to prevent the hiring of Child Labour and has established a remediation plan if such a case occurs. There is no Child Labour on site.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity has implemented processes to prevent the hiring of Child Labour and has established a remediation plan. Document review and interviews with Workers confirm no Child Labour is employed by the Entity. The Entity expects its suppliers to comply with the prohibition of Child Labour.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity has implemented processes to prevent the hiring of Child Labour and has established a remediation plan. Document review and interviews with Workers confirm no Child Labour is employed by the Entity. The Entity expects its suppliers to comply with the prohibition of Child Labour.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has established an ASI PS Management Manual and Prohibition of Forced Labour Procedure to prevent Forced Labour. The Entity expects its suppliers to comply with the prohibition of Forced Labour including slavery and Human Trafficking. A review of personnel files, and interviews with Workers and management, confirmed all employees entered employment voluntarily, and there were no incidents of slavery or Human Trafficking.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has implemented a Policy and established a Procedure to prevent Forced Labour. All employees are employed directly, no deposits, fees or advances are required from employees, as confirmed by Worker interviews.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has implemented a policy and established a procedure to prevent Forced Labour. No foreign Migrant Workers are employed by the Entity. All Workers are Chinese. A document review</p>

CRITERION	RATING	COMMENT
		and interviews with Workers confirm all local and domestic Migrant Workers are not required to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented a Policy and established a Procedure to prevent Forced Labour. There is no presence of Debt Bondage labour case identified during the audit.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an ASI PS Management Manual and Prohibition of Forced Labour Procedure to prevent Forced Labour. There is no restriction on employees' movement at the sites, all employees can access basic liberties freely during work hours and are also free to leave both the working and dormitory areas.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established an ASI PS Management Manual and Prohibition of Forced Labour Procedure to prevent Forced Labour. The Entity does not retain any original documents, passports, or permits, only keep copies of identification which are required for verifying the age of Workers during the recruitment process, these are kept in the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established an Employee Manual which outlines employees are free to terminate their employment with advance notice according to legal requirements and no penalty would be applied. The time for the announcement of termination of the working contract is regulated in the labour contract. Workers in the probation period can end their employment with written notice three days in advance. After the probation period, Workers can end their employment by providing written notice 30 days in advance, without penalty as required by law.
10.4 Non-Discrimination	Conformance	The Entity has implemented policies and procedures to prevent Discrimination during the hiring, promotion, and training processes. No cases of Discrimination have been identified.
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System, with direct and frequent communication with Workers and their representatives during Workers' Council meetings established. Workers have mentioned a positive working climate and direct communication. Additionally, the Entity has conducted an annual

CRITERION	RATING	COMMENT
		<p>satisfaction survey to collect Workers' feedback. Workers can report their concerns through various channels, such as suggestion boxes, email and hotline. The Entity has provided feedback to relevant Workers or external parties regarding corrective actions and status relevant to their concerns.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has established ASI PS Management Manual and Disciplinary Management Regulation regarding disciplinary practices. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. All the disciplinary records must be confirmed by both Workers and management. There have been no cases of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse in the previous year.</p>
10.7a Remuneration (living wage)	Minor Non-Conformance	<p>The basic wage and Overtime remuneration are in Compliance with legal standards for all Workers. Meal allowance, night shift allowance, high temperature allowance, seniority bonus and performance bonus are also paid to Workers. All employees are enrolled in the social insurance and housing fund according to legal requirement. However, the contribution base of social insurances and housing fund for a small number of Workers are local lower limit rather than workers' average monthly incomes of previous year.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity has provided payroll records from the previous twelve months for review. Payments are made on the 10th of each month via bank transfer according to labour contracts. Workers who have resigned are paid in compliance with the legal requirements. There have been no delayed payments in the past twelve months according to bank transfer receipts.</p>
10.8 Working Time	Minor Non-Conformance	<p>The Entity has established Policies and procedures to provide annual leave, sick leave, marriage leave, maternity leave and other relevant leave to Workers, and has a Working Time control procedure to record and track attendance. Overtime is arranged on a voluntary basis. Weekly working hours and the provision of one day off per seven days meets the legal and ILO requirements. However, the consolidated working hours of a small number of Workers does not meet legal standards.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and implemented an OH&S Policy with a commitment to comply with laws and applicable international conventions. The Entity holds a valid ISO 45001:2018 certificate for its entire Certification Scope.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is posted on the Entity's office and workshop bulletin boards. Visitors are briefed on the OH&S management process through videos and site visit requirements.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established an OH&S Management System and implemented an OH&S Policy with a commitment to comply with laws and applicable international conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established an OH&S Policy which indicates the right of employees to refuse to work in an unsafe environment. This policy has been communicated to employees in the orientation training and annual refresher training.
11.2 OH&S Management System	Conformance	The Entity holds a valid ISO 45001:2018 certificate which addresses the entire Certification Scope.
11.3 Employee engagement on health and safety	Conformance	The Entity meets regularly with employee representatives to discuss matters related to OH&S. Records are kept of these meetings and any communication about OH&S. Additionally, the Entity has implemented a policy to reward employees who report health and safety issues.
11.4 OH&S performance	Minor Non-Conformance	The Entity has established objectives and targets to manage its OH&S performance. Improvement programs have been developed. The Entity conducts monthly management reviews to monitor the progress of its objectives and targets. However, the performance of machine safety does not meet this criterion.

Document Control and Version History

Revision	Date	Notes
0	3 August 2023	Initial Certification Audit - Provisional Certification
1	9 August 2024	Surveillance Audit – Full Certification