

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Zhejiang Huashuo Technology Co., Ltd

CERTIFICATE NUMBER
370

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**SHANGHAI KYLIN
CERTIFICATION
SERVICE CO., LTD.**

DATE OF ISSUE
30 AUGUST 2024

DATE OF EXPIRY
29 AUGUST 2025

CERTIFIED SINCE
30 AUGUST 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

Manufacture and processing of
precision die-casting for Aluminium
automotive parts at Zhejiang
Huashuo Technology Co., Ltd –
Factory 3, located in Beilun District,
Ningbo, Zhejiang, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Zhejiang Huashuo Technology Co., Ltd
ENTITY NAME	Zhejiang Huashuo Technology Co., Ltd
CERTIFICATION SCOPE	Manufacture and processing of precision die-casting for Aluminium automotive parts at Zhejiang Huashuo Technology Co., Ltd – Factory 3, located in Beilun District, Ningbo, Zhejiang, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 28 – 30 January 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 1 April 2024
AUDIT SCOPE	<p>The Audit Scope included the design, manufacture and processing of precision die-casting for Aluminium automotive parts at Zhejiang Huashuo Technology Co., Ltd. - Factory 3.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <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.<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 30 August 2024 – 29 August 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 29 February 2025

CERTIFICATE NUMBER 370



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

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

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

ENTITY OVERVIEW

Factory 3 of Zhejiang Huashuo Technology Co., Ltd. (the 'Entity'), located at No. 9 Canglongshan Road, Beilun District, Ningbo, Zhejiang, China, commenced operations in 2017. With the annual production of 30 kilotonnes of Aluminium, the Entity employs approximately 950 people. The Entity specialises in producing semi-solid forming solutions and lightweight Aluminium alloy die-casting parts for new energy vehicle batteries and motor and electric control systems. They are currently the provider of motors for new energy vehicles, as well as inverter and battery components worldwide. They also provide solutions and die-casting products used in automotive lightweight structure parts.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Low	MEDIUM
RISKS	Low	Medium	Low	LOW
PERFORMANCE	Low	Low	Low	LOW
OVERALL		LOW		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established the procedure to comply with Laws, Regulations and other Requirements, which outlines the collection, acquisition, and application of ASI-related requirements. The Entity has provided the most recent 2023 business license for review. The Entity has also provided assessment reports on environmental and safety aspects, a list of social responsibility regulations, a compliance evaluation of labour and business ethics regulations, and records of compliance evaluations of laws and regulations.
1.2 Anti-Corruption	Conformance	The Entity has implemented the Business Ethics Management Procedure, which prohibits any form of Bribery, Corruption and extortion. The Entity has established ASI Policies, including Anti-Corruption Policies regarding Corruption and integrity, fairness, openness and transparency.
1.3a-e Code of Conduct	Conformance	The Entity has established the Code of Conduct to meet regulatory and ethical requirements while setting internal ethical standards, including Human Rights and labour, Environment, Health and Safety (EHS), business ethics, Anti-Corruption and Anti-Bribery, protection of company assets, integrity, confidentiality, fair transactions, anti-money laundering, communication, compliance, and reporting. The Code of Conduct is publicly disclosed on the Entity's website: http://www.china-huashuo.com/cn/Download/144120.html
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity's ASI Manual stipulates that ASI-related Policies should be reviewed every five years or whenever there is an indication of a control gap or any ESG risk changes to the Business. The Entity's ASI Manual is available at: http://www.china-huashuo.com/cn/Download/144111.html However, during employee interviews, it was identified that employees were not familiar with ASI or the associated Environmental, Social, and Governance Policies.
2.2a-c Leadership	Conformance	The Entity's President has appointed a Management Representative responsible for ASI related affairs, internal and external liaison, and implementing the Entity's ASI Policies and objectives. The Entity's Management Review Procedure outlines the resources required for the annual evaluation.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented a certified ISO14001 Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented a certified ISO45001 Social Responsibility Management System. The system has been developed to address various aspects, including women's rights, social factors identification and risk assessment and control, Child Labour, Forced Labour, prohibition of Discrimination, punitive measures, labour Remuneration and Working Time.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established the Supplier and Sub-Contractor Management Procedure and Purchasing Policy, which includes compliance with laws and regulations, Human Rights and labour, quality and safety, energy conservation and environmental protection, fairness and justice. It is also required that the Policy should be reviewed every five years or any indication of a control gap, or any ESG risk changes to the Entity.</p> <p>The Entity's Responsible Purchasing strategy is explained in the "Supply Chain Sustainable Development" section of the '2023 Sustainable Development Report', available on the Entity's website: http://www.china-huashuo.com/cn/Download/144241.html</p> <p>Also, the Entity's Responsible Sourcing Policy is available at: http://www.china-huashuo.com/cn/Download/152877.html</p> <p>The Entity has also obtained commitment letters from its suppliers pledging not to purchase conflict minerals.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has undertaken a project to renovate an existing workshop, replace equipment and modify certain products.</p> <p>The Entity has established a Social Factor Identification, Risk Assessment and Control Management Procedure, which evaluates social responsibility issues including Child Labour, Discrimination, transparency, Forced Labour, and impact on Local Communities.</p> <p>In compliance with ISO14001 and ISO45001 Management Systems, an annual assessment of environmental and health and safety impacts are required. The Entity has developed an Environmental Impact Assessment (EIA) Report, which complies with the national and local regulations. The report evaluates the impacts on the environment, including hydrology, landforms, religious sites and Local Communities.</p> <p>The EIA report is available on the Entity's website: http://www.china-huashuo.com/cn/Download/144121.html</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has established the Social Factor Identification, Risk Assessment and Control Management Procedure. The Entity's ASI Manual stipulates that the Human Resource Department is responsible for conducting Due Diligence on Human Rights and evaluating potential risks. The Entity's evaluation results indicate that there are no Human Rights violations.</p> <p>The Entity's EIA Report evaluates the ongoing production line technology renovation project, which involves 300 employees. This renovation project will not affect the total number of employees, as production needs are addressed through job allocation rather than changes in staffing levels.</p> <p>The results of the Entity's Human Rights evaluation are disclosed in the 'Human Rights Impact Assessment' section of the Entity's 2023 Sustainable Development Report, which is available at: http://www.china-huashuo.com/cn/Download/144241.html</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established a comprehensive emergency plan, the Safety Production Accidents Procedure, which requires the emergency plan to be evaluated every three years. The detailed plan has been registered with the local Emergency Management Bureau of Beilun District. In April and June 2023, the entire factory participated in fire drills and delivered a fire drill report. In April 2023, a chemical Leakage</p>

CRITERION	RATING	COMMENT
		drill was conducted. The Entity's Emergency Response Plan is available at: http://www.china-huashuo.com/cn/Download/144118.html
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed an emergency plan and emergency remedial measures for situations including typhoons, floods, fires, equipment failures, strikes, logistics interruptions and information system failures. For fire emergencies, specific chemical operation standards have been established. The emergency plan includes response strategies for major and sudden environmental incidents. The Comprehensive Emergency Plan for Safety Accidents outlines measures related to safety-related emergencies.</p> <p>The Entity has also developed a Business Continuity and Disaster Recovery Plan Management Procedure. The Procedure requires the Plan to be reviewed every five years, or whenever there are changes to the Business that alter the nature or scale of ESG risks, or if any indication of a control gap.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity's ASI Manual stipulates that the Entity should consider environmental, health and safety, social, and corporate governance factors during Mergers and Acquisitions. The CEO's office will organise a survey and analysis of the target company for any potential Merger or Acquisition project. There have been no Mergers or Acquisitions in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity's ASI Manual stipulates that in the event of closure, retirement or divestment, the President's Office should aim to avoid or mitigate negative environmental and social impacts in accordance with the environmental and social management requirements. There have been no such cases in recent years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed the 2023 Sustainable Development Report, which includes sustainable development strategies, employee rights and benefits, environment and safety, climate change actions, innovation and products, sustainable supply chain, employee training and development, and corporate compliance. The report also discloses the impact of the Entity's activities on the environment, society, and economy. The report is available at: http://www.china-huashuo.com/cn/Download/144241.html
3.2 Non-compliance and Liabilities	Conformance	The 'Legal and Compliant Operations' section of the Entity's 2023 Sustainable Development Report publicly states that the Entity has not been fined, sentenced, or penalised for violating laws and regulations.
3.3a-c Payments to Governments	Minor Non-Conformance	The payments made by the Entity to the government include taxes, social security payments and environmental protection fees. The payment section of the Entity's 2023 Sustainable Development Report discloses the payments made to the government from January to September 2023. However, the report does not fully disclose all payments to the government.
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity's ASI Manual requires the Entity's telephone or email addresses to be disclosed to receive information inquiries, complaints, and appeals from all parties. The Human Resources Centre is responsible for obtaining feedback from internal and external

CRITERION	RATING	COMMENT
and Requests for Information		<p>Stakeholders. The Quality, Environment and Safety Centre is responsible for liaising on corporate governance, EHS, and social aspects. To date, there have been no relevant complaints.</p> <p>The Entity collects employee feedback annually, covering aspects such as living conditions and salary. Employee representatives are elected to provide input on various issues. The Entity also uses the online communication system for internal communication and includes contact phone numbers for external Stakeholders on its website. The Entity has disclosed its Whistleblower Policy at: http://www.china-huashuo.com/cn/Download/144243.html</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has developed a product Environmental Life Cycle Assessment (LCA) Report. However, the report does not clearly specify the source, category and Greenhouse gas emissions information of the purchased Aluminium raw materials.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity's Environment LCA Report is available on its website and can be provided upon customer request. The report includes the product carbon footprint, but does not cover other environmental impacts. The report is available at: http://www.china-huashuo.com/cn/Download/144115.html
4.2 Product Design	Conformance	The Entity has set a target of achieving a 95% pass rate for finished products in order to minimise scrap throughout the entire process. In line with customer requirements, the Design Department optimises product structures and collaborates with clients to reduce material usage where possible. During the design process, designers focus on controlling and optimising mould filling rates to conserve Aluminium material. The Entity has also provided examples of lightweight designs for automotive customers.
4.3a-b Aluminium Process Scrap	Conformance	<p>The slag and waste products that cannot be remelted after processing are sold to waste recycling companies, which then pass them on to other waste disposal companies. Aluminium ash is collected through bag dust removal systems and is sold as Hazardous Waste to qualified companies that recycle Aluminium in accordance with environmental regulations.</p> <p>Scrap materials from the die-casting workshop are returned to the furnace based on their brand names. Waste generated during processing is re-stored and re-released according to brand numbers.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's products are primarily supplied to vehicle manufacturers. In China, regulations govern the disposal of scrapped and End of Life vehicles, which are typically processed by qualified car scrapping companies. Cars sold abroad are subject to local regulations on scrapping. The Entity's ASI Manual stipulates the Entity evaluates its recycling strategies annually and seeks opportunities to improve

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		recyclability rates. The Entity's Recycled Materials Strategy is available at: http://www.china-huashuo.com/cn/Download/153618.html
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established a Greenhouse Gases (GHG) Inventory covering Scopes 1, 2 and 3 emissions. The Audit identified a discrepancy between the total GHG emissions reported for Scope 1 and the production volume. The sources and quantities of Aluminium materials are not clearly detailed, and the calculation of Pre-Consumer and Post-Consumer Scraps are not separately described. In addition, it was found that the data within the report had not been independently verified.</p> <p>The Entity has disclosed its GHG Report on its website at: http://www.china-huashuo.com/cn/Download/144119.html</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started Production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In Production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has set an interim target for reducing GHG emissions over a five-year period from 2025 to 2030. This target includes initiatives such as procuring green power, increasing solar power usage, reducing supply chain emissions, and purchasing Primary Aluminium produced from sustainable energy sources to reduce indirect emissions.</p> <p>The Entity has also outlined nine emissions reduction pathways and corresponding measures. However, the Entity does not specify the emission reduction pathways for each major source of emissions. The reduction pathways address in-direct emissions but do not cover direct emissions.</p> <p>The Entity's GHG Emissions Reduction Plan is available at: http://www.china-huashuo.com/cn/Download/144112.html</p>
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity has established the ASI Manual, which outlines the management principles for the Entity's GHG emissions. It mandates that an internal audit and management review be conducted at least annually to assess the emission reduction performance. However, the Entity's data related to GHG emissions lacks clarity and the decarbonisation pathways for major emissions are not clearly described, which indicates limitations in the carbon accounting capabilities and an underdeveloped GHG management system.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has commissioned a specialised testing company to assess both organised and unorganised exhaust gas emissions. The test results indicate that none of the emissions has exceeded the standard limits. Among the emission reduction measures developed by the Entity, the total amount of exhaust gas emissions are disclosed and

CRITERION	RATING	COMMENT
		<p>there is a plan to reduce emissions by 1% by 2024. The Entity has disclosed its Emissions Reduction Plan at: http://www.china-huashuo.com/cn/Download/144238.html</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity commissioned a special testing company to test the wastewater discharge from the plant and the wastewater test results showed that none of them exceeded the standard limits. The Entity disclosed its total wastewater discharge for 2023, developed emission reduction measures and plans to reduce discharges by 1% in 2024. The Entity has disclosed its Discharges Reduction Plan available at: http://www.china-huashuo.com/cn/Download/144238.html</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has formulated an Emergency Plan for Environmental Emergencies tailored to its specific environmental context. This plan includes environmental risk identification, emergency capacity building, emergency response and post-incident management. It addresses risks related to sudden atmospheric and water environmental emergencies.</p> <p>The Emergency Plan outlines the environmental risk prevention and control measures, defines emergency management requirements, and specifies three levels of emergency response measures. There have been no Spills or Leakages within the Entity.</p> <p>However, during the on-site Audit, it was identified that chemical protection measures within the physical plant area were inadequate. There are also conditions on-site that could alter Material risk levels, but the Entity has not implemented appropriate countermeasures.</p> <p>The Entity's Spills and Leakages Risk Identification and Evaluation Report is available at: http://www.china-huashuo.com/cn/Download/144245.html</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable as there have been no Spills or Leakages since the Entity joined ASI.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Hazardous Wastes generated by the Entity are managed by four qualified suppliers, with disposal agreements and qualification certificates provided on-site. The Entity's solid waste is managed by a designated supplier under a waste disposal agreement. The Entity's annual data on both solid and Hazardous Waste are publicly disclosed on its website: http://www.china-huashuo.com/cn/Download/144239.html</p> <p>However, the Entity has not assessed the Material impact of these wastes on human health and the environment, nor has it developed a comprehensive waste management strategy.</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.8a-d Dross	Conformance	<p>The Entity has a designated hazardous materials warehouse for storing Aluminium Dross, equipped with protective measures and a storage environment that meets basic regulatory requirements. The Entity has also established a management ledger to record both storage and transfer volumes.</p>

CRITERION	RATING	COMMENT
		The Chinese National Hazardous Waste List has classified Aluminium Dross as Hazardous Waste. The Entity has signed a disposal agreement with a qualified company that holds the necessary certification for the recycling and disposal of Aluminium Dross. There has been no landfill disposal.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	With a prohibition on groundwater extraction and no direct use of natural water sources, the Entity exclusively uses tap water for both domestic and production purposes. The Entity has compiled statistics on its monthly water consumption, detailing the total water usage for 2023. The Water Resources Risk Assessment Report indicates the Entity has evaluated its water use risk from five perspectives, and the assessment concludes that the risk associated with water use is low. The Water Resources Risk Assessment Report is available at: http://www.china-huashuo.com/cn/Download/144117.html
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as there were no significant water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Biodiversity Assessment Report outlines its principles for managing Biodiversity and assesses the impact of on local Biodiversity. The assessment results indicate that the Biodiversity risk in the Entity's operating environment is low. The report also includes a Biodiversity improvement plan, which is available at: http://www.china-huashuo.com/cn/Download/144116.html
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Service as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Service as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as no Priority Ecosystem Services has been identified.
8.4 Alien Species	Conformance	The Entity has identified potential pathways by which Alien Species could be introduced and has implemented appropriate prevention and control measures to prevent their accidental and deliberate introductions. No Alien Species have been detected within the Entity's factory premises.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Not Applicable	This Criterion is not applicable as there are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as there are no World Heritage Properties within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity's ASI Management Policy includes a commitment to respecting Human Rights. The Policy is reviewed during management evaluations. The Entity has established a Due Diligence Management Procedure, which requires an annual investigation and a Due Diligence Report on Human Rights impacts. The most recent report indicates that there have been no issues of Human Rights violations.</p> <p>There is a village located one kilometre away from the Entity, and the Ashoka Monastery is three kilometres away. The Entity's evaluation did not identify any adverse impacts on the external environment. The audit team contacted the Lingfeng Industrial Community and the Shen'ao Village Committee by phone, and did not receive any negative feedback about the Entity. The Human Rights Due Diligence Report is available at: http://www.china-huashuo.com/cn/Download/144113.html</p> <p>However, while the Entity provided a Human Rights Due Diligence Report, it did not include a distribution map of the Affected Population and Organisations.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity's ASI Manual ensures equal pay for men and women performing the same work, equal competitive opportunities for women, and the protection of women within full decision-making roles within the Entity without the fear of sexual abuse or Harassment. The Entity has multiple female managers, and has signed a special collective agreement with the Labour Union to protect the rights and interests of female employees.</p> <p>The effectiveness of the Entity's gender equity measures, including the number of female leaders, female employee satisfaction, female turnover rate, training duration for female employees, and female promotion rates, is disclosed in the Sustainability Report, available at: http://www.china-huashuo.com/cn/Download/144241.html</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.

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9.5a Cultural and Sacred Heritage - Identification	Conformance	An ancient monastery of King Ashoka is three kilometres from the Entity. The Entity has conducted an Environmental Impact Assessment (EIA) in accordance with regulatory requirements and submitted it to the Environmental Protection Bureau for approval. The EIA is available to relevant Stakeholders. The Entity conducts annual EIAs and environmental emission testing to ensure that its emissions comply with standards and do not affect the Ashoka Monastery. Testing over the past year has shown that all emissions have met the required standards.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable as the renovation project does not involve the relocation or resettlement of Affected Populations and Organisations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed a Community Management Procedure that includes respect for the traditional rights and interests of the Local Community regarding land, livelihood and natural resources. Telephone communication with the nearby village committee confirmed that the relationship between the Entity and the community is generally harmonious.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established both the Supplier and Contractor Management Procedure and the Social Factor Identification and Risk Assessment and Control Management Procedure. The Entity does not purchase ores from Conflict-Affected and High-Risk Areas (CAHRAs) and requires its suppliers to ensure compliance with Human Rights standards.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity's ASI Social Factor Identification and Risk Assessment has identified CAHRAs, and the Entity has implemented measures requiring suppliers to cease purchases from CAHRAs or to discontinue cooperation with suppliers involved in those regions. The Entity requires their suppliers to complete a social responsibility survey questionnaire and conduct on-site evaluations. Suppliers are required to sign a commitment letter affirming that they do not use conflict minerals. However, the commitment letter does not explicitly cover Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk-based Due Diligence process over its Aluminium supply chain, did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity categorises its supply chain into levels A, B, C and D and conducts regular supplier reviews accordingly.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity's annual Sustainability Report includes a chapter on sustainable development capacity building in the supply chain, which details the responsible management process for conflict minerals. The Entity's social responsibility survey questionnaire and on-site assessment report include an evaluation of supply chain activities, as well as results and findings.

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9.9 Security practice	Conformance	The Entity employs its own security personnel, with a total of eight individuals, who are managed by the Administrative Department. The Entity's ASI Manual and its security system require all security personnel to respect Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established the Administration of the Right to Freedom of Association and Collective Bargaining Procedure to establish, defend and uphold policies regarding Workers' rights to Freedom of Association and Collective Bargaining. Union representatives and members of the Women's Committee are elected by employees. The Labour Union, which employees are part of, is jointly organised by the local companies within the industrial park, supported by the local government and protected by law. The Labour Union organises and distributes benefits to its members during holidays. Interviews show that employees are motivated to participate in the Labour Union.
10.2a-c Child Labour	Conformance	The Entity has developed procedures regarding Child Labour and juvenile labour, with clear requirements for their monitoring. All employees are at least 18 years old. Both the Audit and interviews confirmed there were no indications of Child Labour. The Entity's ASI Manual includes a commitment not to use or support the Worst Forms of Child Labour and outlines remedies to address any instances of Child Labour.
10.3a-c Forced Labour	Conformance	The Entity has developed administrative procedures to prohibit Forced Labour, which explicitly protects Workers' personal freedom. Interviews confirm that the Entity does not support Forced Labour and that employees sign their employment contracts directly with the Entity. There are no other additional costs incurred by employees upon joining and no reported cases of Debt Bondage. Employees are also free to leave the Entity at their own discretion. The Entity's Modern Slavery Statement is available at: http://www.china-huashuo.com/cn/Download/152875.html
10.4a-c Non-Discrimination	Conformance	The Entity has established the Non-Discrimination Management Procedure to protect all employees from Discrimination. Interviews with employees and on-site observations reveal a positive working environment with no instances of Discrimination.
10.5 Communication and engagement	Conformance	The Entity has developed the Communication Management Control Procedure, which outlines specific requirements for both internal and external communication. Communication channels, including suggestion boxes and hotlines, are provided for employees. Management encourages direct communication between employees and management on matters of importance. The Entity's Code of Conduct includes guidelines on non-retaliation. Interviews indicate that employees are aware of these communication channels and do not fear any retaliation for using them.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	The Entity has established administrative procedures that explicitly prohibit Forced Labour, Violence and Harassment. The Entity's Code of Conduct outlines the Entity's responsibility to maintain a positive working environment. Employees are required to report any incidents and the Entity's Code of Conduct is designed to protect both victims of violence and those who report it. The Code of Conduct is available at: http://www.china-huashuo.com/cn/Download/144120.html
10.7a-d Remuneration	Minor Non-Conformance	The Entity has developed procedures for managing labour compensation and has signed labour contracts directly with employees. The sampled employees can provide legal and valid labour contracts and employment information. However, it was identified that the payroll of a small number of employees did not fully comply with local requirements and the Entity could not explain these discrepancies. In addition, the payroll records did not clearly indicate how Overtime was managed in the corresponding payroll forms.
10.8a-c Working Time	Major Non-Conformance	The Entity has established Working Time management procedures that require employees to work in accordance with legal standards and to Overtime only on a voluntary basis. However, sampling of attendance records revealed that Overtime worked by employees exceeded the statutory limits.
10.9a-b Informing Workers of Rights	Conformance	When employees are hired, the Entity provides them with an employee handbook that includes salary and benefits, working hours, overtime, attendance, absenteeism, holidays, communication procedures, disciplinary norms and appeal processes. The Entity's Code of Conduct outlines the legitimate rights and interests of employees. The Entity supports employees' the Freedom of Association and Collective Bargaining and encourages voluntary participation in Labour Unions.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System, supported by well-developed documentation and procedures. The Entity has obtained an ISO45001 certificate, and the information on the certificate has been verified for validity.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity's 2023 annual Target Achievement Report indicates that noise emissions were within acceptable limits, and the rates for occupational disease incidents, fire incidents, electric shocks, mechanical injuries and personal injuries are recorded as zero. All OH&S indicators for the year were met. The Entity's objectives and targets statistical record indicate that its overall performance is at the industry average compared to its peers. However, during the Audit, it was noted that some safety facilities and equipment did not meet the relevant OH&S requirements, workshop areas did not properly identify occupational disease hazards, and some employees did not use personal protective equipment correctly. The Entity's Occupational Health and Safety Goals and Indicator Management Plan is available at: http://www.china-huashuo.com/cn/Download/152872.html

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	The Entity summarises and reports its OH&S performance through annual internal audits and management review meetings. Weekly meetings are held for the factory employees and monthly safety meetings are held between employee representatives and the heads of the various workshop departments to discuss employee health and safety issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 August 2024	Certification Audit – Provisional Certification
1	18 September 2024	Correction to the Certification Scope and removal of the supply chain activity ‘Material Conversion’