

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NINGBO ASIAWAY AUTOMOTIVE COMPONENTS CO., LTD.

CERTIFICATE
NUMBER

241

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SHANGHAI
KYLIN
CERTIFICATION
SERVICE CO.,
LTD.

DATE OF ISSUE

20 SEPTEMBER 2024

DATE OF EXPIRY

19 SEPTEMBER 2025

CERTIFIED SINCE

22 DECEMBER 2022

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

Manufacturing of Aluminium Die Casting Parts at Ningbo Asiaway Automotive Components Co., Ltd. The main processes include Melting, Die casting, Trimming, Deburring, Machining, Cleaning, Packaging and Full inspection. Ningbo Asiaway production facility is located in Ningbo, China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ningbo Asiaway Automotive Components Co., Ltd.
ENTITY NAME	Ningbo Asiaway Automotive Components Co., Ltd.
CERTIFICATION SCOPE	Manufacturing of Aluminium Die Casting Parts at Ningbo Asiaway Automotive Components Co., Ltd., in Ningbo, China. The main processes include Melting, Die casting, Trimming, Deburring, Machining, Cleaning, Packaging and Full inspection.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (20 – 22 September 2022)• Surveillance Audit (22 – 23 April 2024)
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 20 – 22 September 2022 (Initial Certification Audit)• 22 – 23 April 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 12 November 2022 (Initial Certification Audit)• 9 August 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 -22 September 2022)</u></p> <p>The audit scope covers the production of Aluminium Die Casting Parts by Ningbo Asiaway Automotive Components Co., Ltd. at No. 99, Shengyuan Road, Fenghua Economic Development Zone, Ningbo City, Zhejiang Province, China.</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 are included in the Audit Scope.</p>

Surveillance Audit (22 – 23 April 2024)

The audit scope covers the production of Aluminium Die Casting Parts by Ningbo Asiaway Automotive Components Co., Ltd. at No. 99, Shengyuan Road, Fenghua Economic Development Zone, Ningbo City, Zhejiang Province, China.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard are included in the Audit Scope.

AUDIT
OUTCOME

- Provisional Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

20 September 2022 – 19 September 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

19 February 2025

CERTIFICATION
NUMBER

241

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented the Compliance Evaluation Control Procedure and periodically reviews its Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established the Anti-Corruption, Bribery and Embezzlement Control Procedure that requires the Entity's Audit Department to investigate and report cases. The Social Responsibility and Business Ethics Risk Management Control Procedures and Ningbo Asiaway Code of Ethics have also been established. The Entity evaluates risk across five aspects, which includes potential Corruption risks. The Entity provides regular training for employees and a reporting hotline is available.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct, which addresses Environmental, Social, and Governance (ESG) aspects. The Entity's Audit Department conducts an internal audit across each department at least annually. In the past 12 months, the Audit Department has addressed internal disciplinary issues only, there have been no other violations. Interviews with relevant staff confirmed that employees have a copy of the Employee Handbook and are familiar with the Code of Conduct.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an ISO 14001 and ISO 45001 certified Management System. They have implemented an ASI Policy, which addresses social responsibility, the environment, occupational health and safety, business ethics, safety management, governance, and procurement.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The General Manager has approved the ASI Policy which is reviewed annually.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the ASI Policy to employees, including via posts on the workshop bulletin board. Interviews with Workers during the Audit confirmed that employees understand the ASI Policy and that the Environmental, Health and Safety Policy is printed on the employee's work badge. The ASI Policy is available at:

CRITERION	RATING	COMMENT
		https://en.asiawaygroup.com/social-responsibility.html
2.2 Leadership	Conformance	<p>The Entity has appointed the Director of the General Manager's Office as the Management Representative. This role is responsible for all ASI related activities and affairs and internal communication of the ASI Policies, amongst other ESG-related tasks.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has implemented an Environmental Management System certified to ISO 14001:2015.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented a Management System certified to ISO 45001. The Entity has undergone Responsible Business Alliance (RBA) social responsibility audits and established a related Management System including an RBA Manual and procedures relating to labour, occupational health and safety, environment and ethics.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has established a Responsible Procurement Policy, which addresses integrity and self-discipline, Human Rights, material stewardship and conflict affected areas. The Policy is available at:</p> <p>https://en.asiawaygroup.com/social-responsibility.html</p> <p>The Entity's Aluminium suppliers have signed commitment letters or agreements covering responsible procurement, supplier integrity and self-discipline, and conflict-free metal. The Entity has implemented an annual supplier audit plan and has conducted audits of major suppliers.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has implemented environmental, social, cultural, and Human Rights Impact Assessments. A new workshop has been established within the factory. No new employees were hired for the new workshop. The proportion of female employees is 32% and the proportion of female employees in management is 27%. A feasibility analysis of the new workshop was undertaken, which identified environmental factors and hazards during the construction period. The Human Rights impacts were analysed against 27 Human Rights aspects including life, health, work, freedom from exploitation and women's rights.</p>

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has established multiple emergency plans, which address production accidents, chemical leakage, earthquake prevention, typhoon and flood prevention, fire, electric shock, personal injury, natural gas leakage, and environmental emergencies. Emergency drill plans are outlined and various drills were conducted in 2023. Workers interviewed confirmed drills are usually conducted twice a year.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Merger and Acquisition Control Procedure that requires a review of environmental, social and governance issues as part of Due Diligence. However, there has been no such activity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, retirement, and divestment that requires measures to address environmental, social and governance issues. However, there has been no such activity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its 2023 Sustainability Report, which addresses payments to the government, compliance, labour, environmental investment, air and water emissions, waste, leakage and other related matters: https://en.asiawaygroup.com/social-responsibility.html
3.2 Non-compliance and liabilities	Conformance	There are no major violations on the government's Enterprise Information Network for the Entity in 2023. The 2023 Sustainability Report outlines a commitment to abide by and comply with laws and regulations: https://en.asiawaygroup.com/social-responsibility.html
3.3a Payments to governments (legal and contractual)	Conformance	The Entity pays taxes to the government (social security, housing fund, union funds, value-added tax, income tax, land and property tax and urban construction surcharge) in accordance with regulatory requirements, and has disclosed its expenditures in the Sustainability Report: https://en.asiawaygroup.com/social-responsibility.html
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established the Employee Appeal and Complaint Management Procedure, which provides a channel for employees to appeal and report complaints. There is an anonymous reporting mailbox in the workshop. At the end of each quarter, the Entity has an employee communication day and executive and senior management communicate issues with employees on topics including quality, labour rights, personal protective equipment, employee dormitory issues, the cafeteria, and other related topics.</p> <p>The Entity is located in an industrial zone and there are no external complaints.</p> <p>The contact information for external Stakeholders is available on the Entity's website: https://www.asiaway.com/contact-us.html</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	<p>The Entity has undertaken an environmental Life Cycle Assessment (LCA) which evaluated the lifecycle of a T1095273 decomposer end cap Product as the research object. The LCA addressed the raw material consumption using a cradle-to-gate approach for various impact categories, including global warming potential (GWP) and carbon footprint.</p> <p>However, it is notable that the LCA did not address impact categories including acidification potential (AP) and eutrophication potential (EP).</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity's LCA provides cradle-to-gate information, which is available to relevant parties upon request.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has publicly communicated its LCA report: https://en.asiawaygroup.com/social-responsibility.html</p>
4.2 Product design	Conformance	<p>The Entity's design department considers the possibility of weight reduction in its Product design process to enhance sustainability. The Entity provided a case study of an automotive project that optimised wall thickness with a corresponding 8% reduction in weight. The Entity's current utilisation rate of raw materials is 93%.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has established a target for the 100% utilisation of Aluminium. During the casting stage, Primary Aluminium materials and workshop</p>

CRITERION	RATING	COMMENT
		recycled waste are used in varying proportions based on the Product.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented processes to separate Aluminium Process Scrap and categorise the Scrap into levels. Level 1 and 2 waste materials are recovered, classified, and melted in separate furnaces.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity purchases Recycled Aluminum ingots, and has a Recycled Aluminium rate of 81%. The Entity has implemented the Rules on Management of Aluminium Scrap Return Procedure.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity currently mainly supplies to the automotive industry. After a car is scrapped, it usually enters a car dismantling facility where the metal is recovered and reused.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has calculated and disclosed its Scope 1 and Scope 2 Greenhouse Gases (GHG) Emissions and energy use in the GHG Emission Targets and Implementation Plans:</p> <p>https://en.asiawaygroup.com/social-responsibility.html</p> <p>The Entity's GHG emissions data have been verified by a third party. Its Scope 3 GHG emissions, whilst not disclosed, were calculated and verified.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has established a plan to achieve zero emissions of Direct and Indirect GHG by 2030. Photovoltaic power generation commenced in 2023 and contributes approximately 10% of total electrical power. By 2023, The Entity's 2024 target is to reduce Scope 1 and 2 GHG emissions by 2% by, for example, replacing energy-saving lighting fixtures and high energy consuming motors. The Entity is preparing to further reduce energy consumption by purchasing green electricity. The Entity has disclosed its GHG Emissions Reduction Plan in the 'GHG Emission Targets And Implementation Plans' Report:</p> <p>https://en.asiawaygroup.com/social-responsibility.html</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has continued the frequency of semi-annual environmental monitoring by a Third Party company. The environmental monitoring reports confirmed that the Entity's exhaust emissions during the last year were within the standard limits. In the Entity's 2024 Wastewater and Air Pollution Reduction Plan, it is recorded that the Entity's 2023 air pollutant reduction target has been achieved.
6.2 Discharges to Water	Conformance	In 2023, the Entity conducted four wastewater tests that demonstrated Discharges to Water are in compliance with permissible limits. The Entity's 2024 Wastewater and Air Pollution Reduction Plan reports that the 2023 water pollutant discharge reduction target was achieved.
6.3a Assessment and Management of Spills and Leakage (assessment)	Minor Non-Conformance	The Entity has evaluated its processes and identified the main potential risk of Spills and Leakages. There have been no Major Changes to the Entity's plant environment, and the emergency plans and control measures are maintained. The Entity has undertaken a Leakage Risk Identification and Evaluation, and the monitoring indicators were normal. The Entity did not have any significant incidents during 2023. However, on-site observations during the Audit identified that Leakage prevention measures were not implemented across the entire Hazardous Waste warehouse.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted an emergency drill for Leakage accidents in accordance with its emergency plans. On-site observations during the Audit confirmed that the control measures, facilities and trained emergency personnel are adequately equipped to handle emergencies.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an Emergency Response Plan. The necessary facilities are configured and equipped for the implementation of the plan, including the required communications with local Stakeholders.

CRITERION	RATING	COMMENT
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has publicly declared in its Statement of Environmental Leakages that no Spills and/or Leakage occurred during 2023: https://en.asiawaygroup.com/social-responsibility.html
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented its Waste Management Strategy, which addresses hazardous, recyclable, and non-recyclable Wastes generated from its production process and outlines a specific target for the reduction of solid waste. The Entity qualifies its suppliers, recently adding new suppliers associated with the treatment of Aluminium Dross, to ensure appropriate management of its wastes.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed its solid waste management, including the quantity of solid waste disposed and the disposal methods in the Solid Waste Management Information Disclosure: https://en.asiawaygroup.com/social-responsibility.html
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 (start 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.

CRITERION	RATING	COMMENT
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 recovers Aluminium Dross, biscuit, overflow, and machined cut Aluminium chips for remelting internally. The Entity has established a recycling process for Aluminium and has maintained consistent disposal requirements for 2023.
6.8b Dross (recycling)	Conformance	The Aluminium Dross that cannot be recycled and remelted at the Entity is sent to external recycling companies for recycling and processing. These companies recover Aluminium metal from the Aluminium Dross.
6.8c Dross (review of alternatives)	Conformance	The Entity does not landfill Aluminium Dross. The recovered Dross that is not internally recycled is sent to external recycling companies as Hazardous Waste in accordance with local laws. The Entity maintains the licensing information and processing records of the recycling companies.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity does not source water from natural water bodies, the supply for daily operations is provided by the water utility company. The Entity has disclosed its Water Resources Risk Assessment Report, which identifies the average daily consumption, the percentage of water supply and water quality: https://en.asiawaygroup.com/social-responsibility.html
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks, and the risks associated with the surrounding environment and water bodies. The level of water-related risk was identified as low. Further information is available in the Water Resource Risk Assessment Report: https://en.asiawaygroup.com/social-responsibility.html
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risks and impacts were determined as low.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risks and impacts were determined as low.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage and its water-related risks on its website. The Water Resource Risk Assessment Report and 2023 Water Use Inventory Table are available at: https://en.asiawaygroup.com/social-responsibility.html
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Minor Non-Conformance	The Entity has evaluated the impacts on Biodiversity and the identified risk sources including environmental pollution, water pollution and Alien Species. The Entity did not identify significant biodiversity impacts in the Biodiversity Assessment Report. However, an assessment of the impacts on Biodiversity associated with the new building construction was not undertaken.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Although the risk and potential impact on Biodiversity has been assessed as low, a Biodiversity Action Plan is not required. However, the Entity has established a Biodiversity improvement plan that includes greening of the site and the protection of canopy trees and plants.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Although the risk and potential impact on Biodiversity has been assessed as low, a Biodiversity Action Plan is not required. However, the Entity has established a Biodiversity improvement plan that includes greening of the site and the protection of canopy trees and plants.
8.2c Biodiversity management (reporting)	Conformance	Although the risk and potential impact on Biodiversity has been assessed as low, a Biodiversity Action Plan is not required. However, the Entity has established a Biodiversity improvement plan and disclosed its Biodiversity Assessment Report: https://en.asiawaygroup.com/social-responsibility.html
8.3 Alien Species	Conformance	The Entity has analysed the risk of Alien Species and has implemented prevention and control measures. No Alien Species are present on the site and there is no record of exotic species notification.
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.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has an ASI Policy that includes Compliance with laws and regulations, freedom and equality, protection of Human Rights, and continuous improvement.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has disclosed its 2023 Human Rights Due Diligence Report, which indicates that the Entity has not received any complaints regarding Human Rights violations. The Entity has also undertaken an anonymous survey on religious beliefs and has made a commitment to respect the religious background and practices of employees. The Human Rights Due Diligence Report is available at: https://www.asiawaygroup.com/duty-detail.html?id=23
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a Control Procedure for Social Responsibility and Business Ethics Risk Management and conducts Human Rights Due Diligence investigations annually. Should an issue arise, the Entity would act to remediate the impact.
9.2 Women’s Rights	Conformance	The Entity has established a Female Employee Protection Procedure, which details the entitlements for female Workers. Interviews with female Workers confirmed a positive working environment.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within its Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within its Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites or values within its Area of Influence. The nearest

CRITERION	RATING	COMMENT
		site, Yuelin Temple is located over three kilometres away and is not impacted by the Entity's activities.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, as the plant was built on industrial land obtained from the government.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, as the plant was built on industrial land obtained from the government.
9.7a Local Communities (rights and interests)	Conformance	The Entity is located in an economic development zone with other industrial factories to the southeast and west. There is a river to the north, and a nursing home and apartments are 1.3 kilometres across it. It is far away from the residential community. The Entity commits to control environmental impacts and respect the rights of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity is located in an economic development zone with other industrial factories in the southeast and west of the zone. There is a river to the north, and a nursing home and apartments are 1.3 kilometres across it. It is far away from the residential community. The Entity commits to control environmental impacts and respect the rights of Local Communities. The Audit confirmed there were no complaints or negative feedback from the Jiangkou Committee.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs local Workers to support the livelihood of people in nearby communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented its Conflict Minerals Control Procedure, which stipulates that the Entity does not purchase materials from conflict areas. The document review undertaken during the Audit confirmed that Conflict-Free Minerals Investigation Forms and Conflict-Free Metals Declaration Forms were provided and signed by suppliers.
9.9 Security practice	Conformance	The security guards at the Entity are employees. The Entity has implemented its Security System Requirements, which require compliance with relevant laws and regulations, civilised treatment and polite hospitality.

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10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has developed the Management of Workers' Free Association and Collective Bargaining Procedures, which clearly states that the Entity's employees have the right to free association. A Labour Union has been established and Workers can freely choose to join.
10.2a Child Labour (minimum age)	Conformance	The Entity prohibits the use of Child Labour and has maintained its Procedures for Prohibition of Child Labour and Remedies for Child Labour, which includes the necessary measures to be taken if Child Labour is found. The Entity has also implemented its Procedure for Protection of Underage Workers. The youngest Worker at the Entity is 16 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity does not support the use of Child Labour and has a clear definition of the work arrangements for juvenile Workers. They are not permitted to work night shifts, Overtime, or within harmful working environments, including work at heights or in extreme temperatures. The on-site observations and interviews during the Audit confirmed that the working environment for juvenile Workers is appropriate and no Overtime is performed.
10.2c Child Labour (worst forms)	Conformance	The Entity has demonstrated there is no presence of Child Labour or underage Workers and does not support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented its Non-Forced Work Operating Procedure, which prohibits Forced Labour practices and protects the basic rights of employees to work voluntarily.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented its Non-Forced Work Operating Procedure, which prohibits Forced Labour practices. All employees are directly employed, and employees are not charged any kind of deposit, Recruitment Fee or equipment fee. There is no charge for use of personal protective equipment.

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10.3c Forced Labour (migrant workers)	Conformance	There are no Migrant Workers at the Entity, all employees are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not support any form of Forced Labour including Debt Bondage or forced work. Employees work voluntarily and are paid in accordance with their entitlements and legal requirements.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity protects the right of employees to work freely and their freedom of movement in the workplace is not restricted. Workers can freely enter the dormitory during breaks and there are no personal restrictions. This was verified through interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not seize identification cards or other original certificates, only retaining copies of identification documents in personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	All employees have signed labour contracts and both parties agree on the contract duration in accordance with regulatory requirements. Employees are free to terminate their employment without penalty.
10.4 Non-Discrimination	Conformance	The Entity has implemented its operating procedures to prevent Discrimination and Harassment in accordance with the labour law, and it has clearly defined Discrimination, Harassment, and other acts. The Entity has committed to non-Discrimination and supports equality between men and women and equal pay for equal work.
10.5 Communication and engagement	Conformance	The Entity has established various channels of communication with employees. Workers can communicate with management through the site office, mailbox, telephone, and other means. This was confirmed during interviews with Workers who are aware of the communication methods and channels and did not raise concerns regarding threats such as retaliation, intimidation, or Harassment.
10.6 Disciplinary practices	Conformance	The Entity has implemented its procedure that prohibits all forms of corporal punishment and has established a system with appropriate disciplinary measures that are in accordance with the law.
10.7a Remuneration (living wage)	Conformance	The Entity's wage payments meet the minimum basic wage and are higher than the local minimum

CRITERION	RATING	COMMENT
		wage level, as calculated by the Entity. This was confirmed during the review of the Entity's documentation, including the salary schedule. Overtime work on both weekdays and non-working days are paid in accordance with the statutory requirements.
10.7b Remuneration (method of payment)	Conformance	The Entity makes payment of employees' wages by bank transfer and retains a record of payments. The interviews with Workers confirmed that there were no outstanding wage payments.
10.8 Working Time	Major Non-Conformance	The Entity has implemented an attendance and working hours system. However, Workers across five major departments had Overtime hours that exceeded the legal requirement across multiple months, with some employees working more than 36 hours of Overtime per month, and the longest working more than 60 hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented its Occupational Health and Safety (OH&S) Management System and associated OH&S Policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OHS& Policy is displayed and publicised in the Entity's office hall and workshop bulletin boards. The Entity briefs Visitors on the OH&S management process through videos and ensures on-site requirements such as the use of personal protective equipment.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented its OH&S Management System and OH&S Policy, which includes 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 implemented its ASI Policy that specifies the right of employees to refuse to work in an unsafe environment.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has established and implemented an OH&S Management System. However, there are instances of ineffective implementation of the OH&S Management System regarding occupational disease, medical examinations, safety signage, use of PPE and updating the fire inspection form.
11.3 Employee engagement on health and safety	Conformance	The Entity holds regular meetings with the employee representatives. The meetings cover

CRITERION	RATING	COMMENT
		employee OH&S matters, and records of communication of OH&S content are maintained.
11.4 OH&S performance	Conformance	The Entity has established and implemented an Environmental Management System (EMS) and OH&S Management System. The Entity has established target indicators, and all the targets are met. The Entity conducts regular management reviews that include an evaluation of OH&S performance and identification of where improvement is needed.

Document Control and Version History

Revision	Date	Notes
0	22 December 2022	Initial Certification Audit – Full Certification
1	20 September 2024	Surveillance Audit – Provisional Certification