

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Automotive Precision Technology (APT) - Sole Proprietorship LLC

CERTIFICATE NUMBER
393

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM

**TÜV RHEINLAND CERT
GMBH**

DATE OF ISSUE
7 OCTOBER 2024

DATE OF EXPIRY
6 OCTOBER 2027

CERTIFIED SINCE
7 OCTOBER 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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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 of machined and
fabricated Aluminium components
and sub-assemblies for sunroofs,
Electric Vehicle (EV) batteries, car
body and chassis.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Automotive Precision Technology (APT), Abu Dhabi, United Arab Emirates.
ENTITY NAME	Automotive Precision Technology (APT) - Sole Proprietorship LLC
CERTIFICATION SCOPE	Manufacture of machined and fabricated Aluminium components and sub-assemblies for sunroofs, Electric Vehicle (EV) batteries, car body and chassis.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">1 – 4 July 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">2 September 2024
AUDIT SCOPE	<p>The Audit Scope included the manufacture of machined and fabricated Aluminium components and sub-assemblies at Automotive Precision Technology (APT) located in Abu Dhabi, United Arab Emirates.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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	7 October 2024 - 6 October 2027
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE 7 April 2026

CERTIFICATE NUMBER 393



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

Automotive Precision Technology (APT) (the 'Entity') originated in 1997 in the UK, specialising in Aluminium automotive roof storage boxes and sunroof componentry. Now, the Entity operates from its United Arab Emirates (UAE)-based factory fabricating and supplying automotive components for the automotive industry such as general car bodies, chassis, crash management components, electric vehicle (EV) battery application components, bumpers, sill and rockers and sunroof parts to the UK, mainland Europe, USA and Gulf Cooperation Council States (GCC) . The Entity's annual production of saleable product(s) is approximately 7.5 thousand tonnes.

The Entity employs over 170 people at the 98,000 square feet plant in the Khalifa Economic Zones Abu Dhabi (KEZAD) in Abu Dhabi UAE. The Entity provides 'build-to-print' manufacturing services for its customer base, using customer component designs with projects involving a comprehensive 'Design for Manufacture' (DFM) process to ensure customer input.

Key Stakeholders include the UAE's Ministry of Industry and Advanced Technology, Al Ghurair Group, (APT's parent company), Gulf Extrusions (APT's sister company), and suppliers and customers across the GCC, Europe, the UK, the USA and Asia.

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	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to review changes in laws and regulations to manage awareness and Compliance within the organisation. The Environment, Health, Safety, Energy, Sustainability and Security (EHSESS) Department is responsible for the regular collection and assessment of Applicable Laws related to labour, ethics, health and safety and the environment.
1.2 Anti-Corruption	Conformance	As a subsidiary company of Al Ghurair Group, the Entity adheres to the Group Policies. The Entity has implemented an Anti-Corruption Guideline and communicated it internally and externally: https://www.apt.global/policy-and-governance The Entity has established multiple anti-Corruption measures and provided relevant employees anti-Corruption training.
1.3a-e Code of Conduct	Minor Non-Conformance	The Entity has implemented and communicated a Code of Conduct, including principles relevant to social and governance performance. The documents are subject to an annual review. The Code of Conduct is available at: https://www.apt.global/policy-and-governance However, the Code of Conduct does not address environmental principles.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and published a Policy that addresses Occupational Safety and Health, environment, social accountability and governance. All Policies are reviewed annually through management review. New employees receive induction training on the Policies. The Policies are displayed at the Entity including on the Health, Safety & Environment (HSE) noticeboards, and can be accessed at: https://www.apt.global/policy-and-governance
2.2a-c Leadership	Conformance	The Entity's Chief Executive Officer has the ultimate responsibility and authority to ensure conformance with the ASI Performance Standard and sufficient resources for implementation. This role is supported by the Environment, Health, Safety, Energy, Sustainability, and Security (EHSESS) Manager as the ASI representative acting on behalf of the Entity.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established and implemented an ISO 14001:2015 and ISO 500001:2018 certified Environmental Management System. The certifications are available at: https://www.apt.global/accreditation-certification
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Social Management System, which was developed based on the SA8000 standard. The Entity has obtained ISO 45001:2018 certification from an accredited certification body.
2.4a-e Responsible Sourcing	Conformance	The Entity is committed to responsible sourcing. Responsible sourcing is implemented in business partner (suppliers/vendor/Contractors) assessments and by encouraging business partners to implement Environmental, Social and Governance (ESG) Management Systems.

CRITERION	RATING	COMMENT
		The Responsible Sourcing Policy is publicly available on the website: https://www.apptglobal/policy-and-governance
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted an initial Social Impact Assessment, including a gender analysis, which covered the impacts of social, cultural, and Human Rights. No high risks were identified.</p> <p>The environmental impact analysis and Occupational Health and Safety risk assessment are covered by the ISO 14001 and ISO 45001 certified integrated Management System. The Social Impact Assessment Report is available at: https://www.apptglobal/social-impact</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has conducted an initial Social Impact Assessment, including a gender analysis, which covered the impacts of social, cultural, and Human Rights. No high risks were identified. The Social Impact Assessment Report is available at: https://www.apptglobal/social-impact</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented adequate and effective Emergency Response Plans (ERP) and a procedure. This includes crisis organisation, communication guidelines and business recovery plans. An Emergency Response Team has been established and trained annually in accordance with the established annual schedule. An evaluation has been conducted to assess the effectiveness of the ERP drill based on the ERP scenario carried out.</p> <p>The Emergency Response Plans are available to Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Contingency Plan Guidance and procedures. The Entity has established emergency response procedures and appointed an Emergency Response Team and a business continuity management team to implement the Contingency Plan Procedures.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity does not have any plans for mergers and acquisitions. The Entity belongs to the Saif Al Ghurair Group, and mergers and acquisitions are managed by the Group Headquarters (located in Dubai, United Arab Emirates). The Group's Merger and Acquisitions Procedure is established in accordance with the ASI Performance Standard.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity belongs to the Saif Al Ghurair Group, and any closure, decommissioning and divestment activities are managed by the Group Headquarters (located in Dubai, United Arab Emirates).</p> <p>At the time of the Audit, there were no closures, decommissioning or divestments planned.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has disclosed the Sustainability Report 2023, which addresses environmental, social and economic impacts: https://www.apptglobal/sustainability-report</p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed information on fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its corporate sustainability reporting. There are no non-compliance or liabilities reported, please refer to the Sustainability Report, page 41: https://www.apt.global/sustainability-report
3.3a-c Payments to Governments	Conformance	The Financial Audit Report 2023, issued by a qualified Third Party, identified the Entity's payments to the government are only those legally required, and no other payments are reported. The Entity has disclosed the payments to governments in the Sustainability Report 2023, page 41: https://www.apt.global/sustainability-report
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has developed and implemented Policies and documented processes appropriate for complaints, grievances and Stakeholder requests for information. The Entity's integrated Management System receives, manages, processes and follows up on reports/disclosures regarding violations of laws and regulations. The Entity's Code of Ethics complies with generally accepted accounting principles, operational Policies, and procedures. It also prohibits any fraudulent acts, allowing for anonymous reporting. The Entity has implemented several mediums to allow direct engagement by Stakeholders.</p> <p>The Complaints Resolution Mechanism can be accessed via the website: https://www.apt.global/contact-us https://alghurair.whispli.com/kpmg?locale=en</p> <p>However, during the Audit, it was noted that the Response Time Statement was not included in the Complaints Resolution Mechanism Policy or procedure.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) to assess the impact of the Aluminium production process. The impact categories calculated in the study addressed global warming, acidification, eutrophication, ozone layer depletion, and the use of energy and renewable energy. The LCA study has been undertaken according to ISO 14040 and ISO 14044 standards. The LCA reports can be accessed on the website: https://www.apt.global/life-cycle-assessment-lca
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has made public the LCA Report and commits to communicating the results of the LCA: https://www.apt.global/life-cycle-assessment-lca
4.2 Product Design	Not Applicable	This Criterion is not applicable as the Entity has no design responsibility. All technical designs are provided by the customer (the automotive company), and the Entity only carries out the manufacturing process in accordance with the design criteria provided by the customer.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a strategy to minimise scrap generation through quality improvement. The Aluminium Process Scrap is grouped, and quantity/inventory is monitored by Enterprise Resource Planning (ERP) software/system and collected in a scrap box. All Aluminium waste generated during the manufacture of components is provided to the supplier for recycling.

CRITERION	RATING	COMMENT
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity engages with regional (groups) collection and recycling systems to support accurate measurement and efforts to increase recycling rates in their respective markets for their Products containing Aluminium.</p> <p>However, the Sustainability Report does not provide specific recycling strategy information, including schedules, activities, and targets, refer to page 22: https://www.apr.global/sustainability-report</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity only supplies other businesses (automotive manufacturers) and does not sell directly to consumers (the end users).</p> <p>However, the Entity informs customers that the components produced are recyclable materials by providing a material composition certificate. All the waste generated (including rejected products) during the manufacturing process of the components is provided to the supplier for recycling.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>Greenhouse Gas (GHG) Emissions data is available in the Sustainability Report 2023, pages 16-17: https://www.apr.global/sustainability-report</p> <p>The GHG emissions calculation is performed and verified by a qualified Third Party.</p> <p>However, it was identified the Entity has not publicly disclosed detailed calculations of GHG Scope 3, Category 1 emissions in the Sustainability Report.</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 established a 2024 (January to May) baseline year and Intermediate Targets. The Entity has used the ASI methodology and calculation tool to develop a GHG Emissions Reduction Pathway. All supply chain activities with the Entity's Certification Scope are included in the GHG Pathway scope. However, the Entity has not disclosed the pathway as the data has not yet been verified by an independent and competent Third Party.</p> <p>The Entity has defined processes to review and disclose changes to its Pathways, Plan and annual performance. The Plan is aligned with actions towards the achievement of Intermediate Targets. The Entity has published a GHG Emissions Reduction Plan for how it expects to meet its targets in the Sustainability Report, pages 16-19: https://www.apr.global/sustainability-report</p>
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an Environmental Management System (EMS) that is ISO 14001:2015 certified. The EMS covers environmental aspects and impacts related to GHG emissions

CRITERION	RATING	COMMENT
		<p>and their control. The Entity has documented and implemented several programs for reducing GHG emissions, more information is included in the Sustainability Report on pages 17-19: https://www.apptglobal/sustainability-report</p> <p>Quantitative data is available in the LCA Report: https://www.apptglobal/life-cycle-assessment-lca</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has established an air emissions Management System that measures and reports on emissions with continual improvement to mitigation actions and controls, and complies with local legislation. The Entity has installed air emission control devices that treat gases before they are released into the environment. The Emissions to Air are substantially below regulatory limits. Air emission information can be accessed in the Sustainability Report, page 17: https://www.apptglobal/sustainability-report</p>
6.2a-g Discharges to Waters	Conformance	<p>The Entity has established a continual reduction plan for the discharge of wastewater and all the improvement programs are tracked. The Facility publicly disclose Material Discharges to Water from its activities in the Sustainability Report, page 24: https://www.apptglobal/sustainability-report</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has completed a Spill and Leakage risk assessment as defined in relevant procedures and work instructions. The Spills and Leakage management plan is available to Stakeholders upon request.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established an Environmental Protection Procedure that defines how to dispose of and report Spills in accordance with the ISO 14001:2015 standard and applicable local legislation. If there is a Spill, the Emergency Response Team implements the Emergency Response Procedure. Spill drills have been conducted annually to ensure the effectiveness of emergency actions taken and the process is up to date. Specific information about Spills and Leakage is disclosed in the Sustainability Report, page 33: https://www.apptglobal/sustainability-report</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established a Waste Management Procedure that defines the process for collecting and disposing of all Waste. All Hazardous Waste is transferred to qualified and licensed third parties according to legal requirements. Inventory and disposal receipts are retained for review. The Entity has established a target for continuous improvement to reduce waste generation, and this target is reviewed annually by senior management. The details on Waste management and the quantity generated are included in the Sustainability Report, page 22: https://www.apptglobal/sustainability-report</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has disclosed its water withdrawal and use and conducted a water assessment considering the water-related risks, which were determined as low, refer to Sustainability Report, page23: https://www.apt.global/sustainability-report
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material water-related risks. However, the Entity has established annual targets to continually reduce water consumption and has implemented programs to achieve these targets. The targets and programs are publicly disclosed in the Sustainability Report, page 23: https://www.apt.global/sustainability-report
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity risk assessment, performed by a qualified and independent third party, which considered the site's operations and Area of Influence. The Facility is located in a licensed Industrial Park and the risks and impacts on Biodiversity and Ecosystem Services were determined as low. Refer to the 2023 Sustainability Report, page 25: https://www.apt.global/sustainability-report
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the assessment determined that the Entity's impact on Biodiversity is low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the assessment determined that the Entity's risks and impacts on Biodiversity and Ecosystem Services is low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the assessment did not identify Priority Ecosystem Services within the Entity's Area of Influence.
8.4 Alien Species	Conformance	The Entity has assessed the Alien Species, and no high risk has been identified. One of the preventive measures taken by the Entity is the requirement for the fumigation of wooden pallets used to export and import goods.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to "No Go" in World Heritage Properties. The Entity is located in a permitted Industrial Park by the government, and there are no World Heritage sites located near or adjacent.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located in a permitted Industrial Zone by the government, and according to the UNESCO World Heritage list, there are no Protected Areas near or adjacent to the Entity.
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.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Group headquarters has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights. The Policy is available at: https://www.apt.global/policy-and-governance</p> <p>The Entity has conducted a documented Social Impact Assessment with internal Stakeholders, available at: https://www.apt.global/social-impact</p> <p>The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews during the Audit.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>Women's legal rights and interests, such as gender equality advancement opportunities, and maternal health, are upheld and respected by the Entity, which has implemented its Gender Responsive Policy.</p> <p>The Entity has implemented initiatives to promote leadership opportunities, fair representation, and equal pay for women. This includes actively recruiting women for office-based positions, production tasks, and forklift drivers, and providing upskilling programs for female employees in areas such as forklift operation techniques, load manual handling, and equipment maintenance for career advancement and job enrichment.</p> <p>During interviews and site observations, no complaints were made by female employees, and there was no evidence of Discrimination against women.</p> <p>The Entity has published gender diversity metrics, such as the proportion of male and female employees, available in the Sustainability Report and the Social Impact Report.</p> <p>Sustainability Report, page 29: https://www.apt.global/sustainability-report</p> <p>Social Impact Report: https://www.apt.global/social-impact</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within 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 to the Entity, as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites or values near the Entity as it is located in an Industrial Park.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes that might impact or cause physical and/or economic displacement.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the Stakeholder assessment (Social Impact Assessment) determined that there are no Local Communities nearby, and it is confirmed that there are no salient issues.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has implemented processes to ensure risk-based Due Diligence in its Aluminum supply chain. Management periodically conducts documented risk assessments, and the latest assessment confirms that the Entity does not procure from conflict-affected or high-risk areas.</p> <p>The Entity has developed an ASI Standards Manual that outlines the procedures to prevent them from supporting armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. And has implemented procurement procedures and improvement plans.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Responsible Sourcing Policy has been issued and communicated to all related parties. Responsible sourcing is implemented in the Entity through business partner (suppliers/vendor/Contractors) assessments and encouraging business partners to implement ESG Management Systems.</p> <p>Based on vendor/supplier evaluation and re-evaluation reports, as well as signed commitments from suppliers, no materials have been sourced by the Entity from Conflict-Affected and High-Risk Areas.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the Entity's assessment did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity was audited against the ASI Performance Standard which includes an audit on Due Diligence processes and addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has implemented a supply chain Due Diligence process, however, it has not yet publicly disclosed the process and its results.
9.9 Security practice	Not Applicable	This Criterion is not applicable, the Entity does not have any surveillance or security service.

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable as UAE law restricts the rights of Workers to associate freely with Labour Unions, seek representation and join Workers' councils. However, the Entity commits itself to respect the Workers' rights. There are two elected Worker representatives. Worker representatives confirmed that the Entity respects the rights of Workers to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has had a commitment to respecting Workers' rights. There are two elected Worker representatives, who confirmed that the Entity respects the rights of Workers to Collective Bargaining.
10.2a Child Labour	Conformance	The Entity has established and implemented a recruitment procedure to ensure the minimum age for hiring Workers is 18 years. The Human Resources Department checks and verifies Worker's documentation, which may include a family tree, education qualifications, or national identity card during the employment application process. The Policy is also applicable to sub-Contractors working at the Facility.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has established a Policy to ensure it does not engage in nor support Forced Labour, including slavery and Human Trafficking.</p> <p>The Entity does not use a recruitment agency and only engages a recruitment specialist for the recruitment of senior positions. All Workers interviewed have stated that they were directly hired voluntarily. They were asked to submit copies of government-issued identifications (such as national ID cards, school certificates, or birth certificates) via email or postal service. Once hired, they were required to present the original documents to verify that the copies were legitimate. After verification, they were allowed to retain their original documents.</p> <p>No accommodation provided for Migrant Workers, however, the allowances are paid to the employee for housing and transportation.</p> <p>The interviews with Workers and the Human Resources, as well as document review, did not indicate the use of Forced Labour, slavery, or human trafficking.</p> <p>The Entity has developed a detailed Modern Slavery Statement, however, it is not publicly disclosed.</p>
10.4a-c Non-Discrimination	Conformance	<p>Workers are hired based solely on their abilities and the Facility's production needs and the review of records confirms this. The Entity ensures all employees receive equal opportunity to participate in education and training programs in accordance with their needs and the business development plans. The Entity provides induction on the Group Code of Conduct with ongoing training and awareness programs as well it being displayed on screens located in the canteen and shop floor.</p> <p>The Entity regularly reviews its Policies and practices, seeking feedback from employees and Stakeholders to ensure continuous improvement in promoting a non-discriminatory work culture.</p> <p>There were no complaints of Discrimination received during the Audit.</p>
10.5 Communication and engagement	Conformance	The Entity has implemented an adequate and effective grievance/complaint process where work-related and Code of

CRITERION	RATING	COMMENT
		<p>Conduct-related grievances or complaints can be confidentially communicated by employees without fear of reprisal or intimidation. The grievance channel is communicated and posted on the workshop, including a suggestion box and an Administration Department hotline. All communication and engagement records are current.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a Workplace Policy on Violence and Harassment as regulated by the Group's Code of Conduct. Policies are reviewed annually through management review and updated to reflect any change in business processes, standards and legal obligations. New employees receive induction training, and all employees receive refresher training every three years regarding the Code. Workers are involved in the review of the Workplace Policy at the annual management review meeting. The agenda, minutes of meetings and attendance list are available during the Audit.</p> <p>The Code of Conduct is available at: https://www.apt.global/policy-and-governance</p>
10.7a-c Remuneration	Conformance	<p>All employees are paid correctly calculated wages for both regular and Overtime hours. Workers receive prompt payment for each pay period, as well as clear and detailed statements outlining working hours. The Entity makes Overtime payments for weekdays, rest days and statutory holidays at 150%, 200% and 300% of regular pay, respectively. And the salaries of the female Workers are paid directly into their bank accounts in their own names.</p> <p>Disciplinary actions do not result in wage reductions or deductions. A sampling of payroll slips confirmed no monetary deductions were made.</p>
10.8a-c Working Time	Conformance	<p>Working time is recorded electronically (biometric) by the Entity, with working hours in Compliance with local laws. Workers receive at least one day off every seven days. To determine, communicate, record, manage, and control working hours, including Overtime, adequate and effective Policies, systems, and procedures are established. These include accurate and thorough records of employees' regular and Overtime working hours. Mandatory breaks, holidays, and annual leave are granted to employees, along with time off for illness or maternity leave.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity communicates the Human Rights Policy which includes informing employees of their rights through mechanisms including induction of new employee training, email, posting in strategic places, and meeting agenda items. The Company Regulation document governs the rights and responsibilities of employees. All employees can access this regulation through the company's internal portal.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System. The OH&S objectives and targets are established and documented in the OH&S Program. The implementation plans are established and implemented. The Entity's OH&S performance is monitored monthly, and the management review is conducted annually.</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The OH&S objectives and targets are established and documented in the OH&S Program. The implementation plans are established and implemented. The OH&S performance is tracked monthly to ensure full Compliance. The OH&S management review is conducted annually. The Entity has publicly disclosed the effectiveness of the OH&S Management System in the Sustainability Report, page 33: https://www.apptglobal/sustainability-report</p> <p>However, leading and lagging performance indicators are not publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has a system of Workers' consultation and participation in health and safety in accordance with ISO 45001:2018. Workers are encouraged to directly report any concerns or suggestions regarding OH&S issues, either personally or through a representative. Management responds to the OH&S concerns and advice received. Every employee has a target to make safety observations set by management.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 October 2024	Initial Certification Audit – Full Certification