
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

JIANGSU GOKA LIGHT ALLOY CO., LTD.

CERTIFICATE
NUMBER

266

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

30 MARCH 2023

DATE OF EXPIRY

29 MARCH 2026

CERTIFIED SINCE

30 MARCH 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Goka', written over a white background.

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

Jiangsu Goka Light Alloy Co., Ltd. located in Xiangshui County Industrial Park, Yancheng City, Jiangsu Province, China. Goka produces various aluminium extrusion profiles and fabrication products to customers.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Goka Light Alloy Co., Ltd.
ENTITY NAME	Jiangsu Goka Light Alloy Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Goka Light Alloy Co., Ltd. located in Xiangshui County Industrial Park, Yancheng City, Jiangsu Province, China. Goka produces various aluminium extrusion profiles and fabrication products to customers.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (12 – 14 January 2023)Surveillance Audit (17 – 18 June 2024)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">12 – 14 January 2023 (Initial Certification Audit)17 – 18 June 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 February 2023 (Initial Certification Audit)13 August 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 14 January 2023)</u></p> <p>The audit scope covered the activities at the production plant Jiangsu Goka Light Alloy Co., Ltd. for the manufacture of aluminium extrusion and fabrication products including aluminium profiles and parts.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (17 – 18 June 2024)</u></p> <p>The audit scope covered the activities at the production plant for the manufacture of aluminium extrusion and fabrication products including aluminium profiles and parts.</p> <p>Supply chain activities included in the audit scope:</p>

-
- Semi-Fabrication

All applicable criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- 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.
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CERTIFICATION
PERIOD

30 March 2023 – 29 March 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

29 March 2026

CERTIFICATE
NUMBER

266

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has established a procedure to collect the Applicable Laws and regulations. The Quality Department, Environment, Health, and Safety (EHS) Department and Human Resources and Administration Department are responsible for the collection of relevant laws and regulations and their assessment at least annually, covering labour, ethics, health and safety and environment sections. However, based on the document review, some laws/regulations are missing.
1.2 Anti-Corruption	Conformance	The Entity has established anti-Corruption and anti-Bribery management procedures. The anti-Bribery management team has been established and carried out assessments regularly including a Bribery risk assessment level standard. Employees are regularly trained. The Administration Department evaluates the implementation of anti-Bribery work annually to determine whether the measures are sufficient and effective, and the status of Bribery risks.
1.3 Code of Conduct	Conformance	The Entity has formulated an ASI Code of Conduct, which includes environmental, social and governance principles. The Entity undertakes an internal audit and management review every year to review the Code of Conduct. And provides related training on the Code of Conduct to employees.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an Environmental, Social, and Governance Policy, available at: http://www.cngoka.com/news/445.html
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Environmental, Social, and Governance Policy are approved by the General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has established an ASI Performance Standard manual, including the Policies and procedures, which are communicated externally via the Entity's website (http://www.cngoka.com/news/1) and internally via information bulletin boards and training.

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has appointed a Management Representative with the responsibility and authority to implement the Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an ASI Management System, which covers the Social Management System. The Entity has obtained ISO14001:2015 and ISO 45001:2018 certification. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes for responsible sourcing. The Entity conducts supplier assessments before sourcing and annual assessments. The Responsible Sourcing Policy is available at: http://www.cngoka.com/news/446.html
2.5 Impact Assessments	Conformance	The Entity has established and implemented Human Rights Due Diligence procedures. It has assessed the impacts on the environment, health and safety based on ISO14001 and ISO 45001. The risk assessments for impacts on social responsibility and Human Rights are carried out using their Social Management Questionnaire.
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented Emergency Response Plans. Personnel training and drill records were verified during the Audit. The Entity holds a valid ISO 14001 certificate and ISO 45001 certificates.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger and acquisition management procedure. Until now, no mergers and acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established closure, decommissioning and divestment management procedures. Until now, no closure, decommissioning or divestment has occurred in the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publishes a Sustainability Report that is available at: http://www.cngoka.com/news/439.html

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity has no non-compliances or liabilities as reported in the 2023 Sustainability Report, page 6: http://www.cngoka.com/news/439.html No such cases are raised by government agencies (https://www.gsxt.gov.cn) and non-governmental organisation websites (https://www.qcc.com).
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in the tax payment certificate.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	This Entity has established and operates a Stakeholder complaints, grievances and requests procedure, which has been formulated to publicise the Entity's contact telephone number, email address, suggestion box and other information to Stakeholders through the public board, accepting information inquiries, complaints and appeals from all parties. The Human Resources Department sets up posts to track the requests and complaints of Stakeholders with appropriate resolution mechanisms.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes for Life Cycle Assessments (LCAs). An LCA has been prepared for all related Products according to the Entity's LCA management procedure. The LCA report is publicly available at: http://www.cngoka.com/news/440.html
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products. The LCA focuses on the environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented Policies and processes for LCA, including their public communication. LCA studies are available upon customer request. Also, the LCA Report is published on the Entity's website: http://www.cngoka.com/news/440.html
4.2 Product design	Conformance	The Entity has established and implemented a product design procedure. It includes relevant

CRITERION	RATING	COMMENT
		objectives in the design and development process to enhance sustainability throughout the entire product development process. The design considers reparability, product decomposition, and recycling of components during both the product's use phase and at the End of Life. After the start of production, the product and its components are disassembled and analysed. Suggestions for improvement are incorporated into the further product development process.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its operations and the generated target of scrap for collection, recycling and/or re-use, is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has an Aluminium production waste and scrap management process to classify and dispose of the different kinds of Aluminium Scraps. All scrap material is classified through alloy separation and disposed of by different smelters. Related records are kept for review.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy including specific timelines, activities and targets. The Entity is in ongoing discussions with its main customer on how to improve the recycling rate of its products at end-of-life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no complete local, regional or national collection and recycling systems for Aluminium Scrap in China. The Aluminium production waste is entrusted to a local company for remelting and recycling. The Entity is working with the customer to decide how to improve the recycling rate of products at end-of-life. Recycling contracts with customers to collect the scraps of products at end-of-life and related recycling records are kept.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has ISO 50001 certification, and it has accounted for and publicly disclosed Material Greenhouse Gases (GHG) emissions and energy use annually. 2023 Sustainability Report, page 11: http://www.cngoka.com/news/439.html 2023 Greenhouse Gas Emissions and Targets: http://www.cngoka.com/news/433.html
5.2 GHG emissions reductions	Conformance	The Entity set up a GHG emissions reduction target for 2024 to reduce the GHG emissions per product

CRITERION	RATING	COMMENT
		based on 2023 levels. The main strategy is to reduce unnecessary electricity consumption and increase the ratio of green energy. The reduction target is available on the Entity's website: http://www.cngoka.com/news/433.html
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 pollutants in air emissions are quantified in the Environmental Impact Assessment Report. The status of the air emission is monitored and meets the local legal emission limit.
6.2 Discharges to Water	Conformance	The Entity has established water reduction targets and established a related plan to minimise adverse impacts. The monitoring reports for wastewater show major pollutants were monitored. The monitoring results for these major pollutants achieve the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity undertakes regular Spill and Leakage assessments with leak risk assessment reports. No high-risk situations have been identified, and the Entity has taken preventive action or implemented improvement programs for the potential risks identified.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established an Emergency Response Plan that includes external communication processes. Assessment and management of Spills and Leakage are defined in the Environmental Management System and follow the control measures in the list of spill risk factors. Major Spills and Leakages will be managed and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an Emergency Response Plan and Response Guide defining how to dispose of and report Spills. If there is a Spill, the Emergency Response Team (ERT) would follow the response process to deal with it accordingly, and drills are conducted annually to ensure the process is up to date. The Entity has never had a Spill-related

CRITERION	RATING	COMMENT
		accident, this information is also disclosed in the annual Continual Development Report. The Entity will report the Spills to local authorities and impacted units and people immediately.
6.4b Reporting of Spills (regular reporting)	Conformance	No Spills have occurred in recent years. The Emergency Response Plan and Response Guide define that the Entity will report the Spills to local authorities and impacted units and people immediately and disclose it in the annual Continual Development Report, which is available upon request.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has an ISO14001 certified Environmental Management System and has a Waste Management Procedure which defines the processes to collect and dispose of waste. The Entity has established continual improvement targets to reduce the waste generation per unit. The management team reviews the targets quarterly.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the information on the quantity of Hazardous and Non-Hazardous Waste generated and associated waste treatment methods, available in the 2023 Sustainability Report, page 9: http://www.cngoka.com/news/439.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.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a water-related risk analysis, including water balance, to determine and map the source and type of water it draws and uses. The Entity has a water balance report, water resources management goals and plans, and a water balance chart.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The water risk assessment considered the Entity's location within the industrial park, nearby lands and waterways risks within their Area of Influence. Due to the nature of the product and production processes, and most of the Entity's sites have closed-loop Water Management Systems in the local water environment, water-related risks are low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, as there were no identified significant water-related risks within the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope, as there were no identified significant water-related risks within the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Entity's ASI Manual has defined a Policy and procedure for publishing water management information. The Entity has conducted water risk assessments. The Entity's water usage and risks assessment report is available on the Entity's website: http://www.cngoka.com/news/438.html

CRITERION	RATING	COMMENT
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has established procedures for the protection of Biodiversity. A Biodiversity Risk Assessment Report has been prepared. The Entity is located in an Industrial Park developed by the local government where there is no protected flora or fauna in this area. There is no significant risk of Biodiversity impacts.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity Risk Assessment did not identify significant Biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity risk assessment did not identify significant Biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity risk assessment did not identify significant Biodiversity impacts.
8.3 Alien Species	Conformance	The Entity has evaluated and implemented control risks of Alien Species that could be accidentally introduced by the Entity through operational activities. According to the Biodiversity Risk Assessment Report, the only source that could introduce the Alien Species are wooden pallets used for product packaging. All pallets are fumigated before use to prevent the introduction of Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing 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 implemented a Social and Environmental Governance Policy, which includes a commitment to respect Human Rights, the civil rights of employees and the elimination of Discrimination, which is communicated and trained to all employees,

CRITERION	RATING	COMMENT
		and published on the Entity's information bulletin board.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity is committed to respecting Human Rights and extends this commitment to its supply chain. The Human Rights Due Diligence process is established covering the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report, and no adverse Human Rights impacts have been reported since its establishment and no remediation is required. A remediation process for any adverse Human Rights impacts is available.
9.2 Women's Rights	Conformance	The Entity has developed a Women's Protection Management Procedure for the protection of women's rights and interests. The Entity has clarified the legitimate rights of women and implemented control measures to ensure that these rights are respected. No complaints have been received from women Workers, and they are aware of their rights.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there is no cultural and sacred heritage within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as there is no project that would cause resettlements. The Entity is located in an Industrial Park developed by the local government.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as there is no project that would cause resettlements. The Entity is located in an Industrial Park developed by the local government.
9.7a Local Communities (rights and interests)	Conformance	The Entity has formulated and implemented a Community Participation Management Procedure to commit to respecting the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources while exploring opportunities to respect and support community livelihoods with the Xiangshui Industrial

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		Economic Zone. No complaints have been received from Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity is in close contact with the surrounding communities. Most of the employees are from the local area. The Facility has installed environmental protection devices, such as an air emission treatment Facility, to reduce the impact of air emissions and boundary noise on the surrounding communities, as reported in the Environmental Impact Assessment Report.
9.7c Local Communities (livelihoods)	Conformance	The Entity is in close contact with the surrounding communities. Most of its employees are from the local area. The Entity has established a plan to support the surrounding communities such as supporting the local charities and participating in community public welfare activities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a Control of Conflict Minerals Procedure, a commitment not to use conflict minerals and communicates this throughout the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a commitment letter not to use conflict minerals. No complaints have been received to date.
9.9 Security practice	Conformance	The Entity has implemented a Security Service Management System. The Entity has also clearly defined the primary role of security guards, which is to protect people, property and/or assets and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have been reported.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1b Freedom of Association and Right to Collective Bargaining (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.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Although there are no Collective Bargaining Agreements, the Entity has implemented a procedure for Freedom of Association and collective consultation to respect the right to Freedom of Association and Collective Bargaining. The Entity is committed to

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		respecting Workers' rights. A Labour Union and an association for Workers have been established in accordance with Applicable Law on behalf of employee rights such as labour Remuneration, working hours, rest and vacation, labour safety and health, vocational training, insurance and welfare.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented a Child Labour Rescue Policy. The age of each candidate is verified through an interview and the review of identification cards. There is no incidence of Child Labour or any young Workers in the company. The youngest Worker on site is 20 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a management program for Child Labour and Young Workers. The Entity does not support any form of Child Labour. Young Workers are under special protection by labour standards law and are not allowed to work in Hazardous working conditions. The Entity does not recruit Child Labour or young Workers.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour. There is neither Child Labour nor any young Workers in the Entity. The Entity communicates the requirement to the Workers and its suppliers to ensure that the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established and implemented an Anti-Forced Labour Management Procedure, and commits to and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Forced Labour is prohibited and stipulated in the employee handbook. No form of Forced Labour is found within the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. This is verified through Worker and management interviews and payroll review. All employees are not required to pay any form of deposit; recruitment fee or advance at any stage of employment.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers in the Entity, all Workers are Chinese. The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity does not hold Workers in Debt

CRITERION	RATING	COMMENT
		Bondage nor force them to work in order to pay off a debt.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity prohibits any form of Forced Labour and does not provide any form of loans to Workers. There are no Debt Bondage clauses in the labour contracts signed between the Entity and Workers. The pay slips indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The Entity is not involved in Forced Labour. There are no restrictions on Workers' freedom of movement at the site. Workers are free to leave the factory when not engaged in work; Workers move freely when needed to access basic liberties, such as going to the toilet and drinking water. They can go to the external medical facilities if they feel unwell. Interviewed employees stated there were no constraints.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. There is no retention of original documents of the Workers, only copies of original documents are kept in Workers' personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established and implemented the Anti-Forced Labour Management Procedure. The notice period for termination of employment is in compliance with the labour contract law: thirty days in advance or three days during the probation period.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Procedure to ensure equal opportunities, and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	The Entity has formulated and implemented an Employee Complaints Management Procedure. Regular meetings are held between the trade union and senior management. A grievance and complaint hotline and email, and operating procedures, ensure open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation or Harassment.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity has established a Rewards and Punishment Management Control Procedure and does not tolerate any form of punishment or Harassment. Suppliers are required to comply with the procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker representation. All disciplinary records need to be confirmed by Workers and management.
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented Salary and Welfare Management Procedures. The wage structure is clearly defined, and the basic wage complies with the local legal minimum wage. The compensation for Overtime work meets the legal requirements. The total payment meets Workers' basic needs, and all employees enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid promptly to all Workers by bank transfer on the 25th of every month.
10.8 Working Time	Minor Non-Conformance	The Entity has implemented an attendance and working time system. Based on the review of attendance records and interviews with Workers, the total working hours per week did not exceed 60 hours, and at least one rest day per week is guaranteed. Based on the review of the 'Voluntary Overtime Management Procedure' and confirmation from Workers, Overtime is voluntary, and Workers can refuse Overtime. However, the monthly Overtime for some selected Workers was more than 36 hours, which exceeded the requirements of Chinese Labour Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity holds a valid ISO 45001:2018 certificate. The Entity has established formal Policies for Health and Safety (OH&S) which are posted on information bulletin boards.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has established sufficient and effective management manuals and procedures to ensure that all employees and related parties comply with the internal OH&S Policy, including induction training for new employees, regular physical examinations and regular monitoring.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity holds a valid ISO 45001:2018 certificate. The OH&S Policy includes a commitment to comply with the legal, health and safety and other requirements. Systems are established to identify all applicable legal requirements and other requirements and evaluate compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an OH&S Management System to ensure Compliance with relevant laws and regulations, and to provide training to employees on the hazards of their work and their right to refuse unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity holds a valid ISO 45001:2018 certificate (valid until 7 March 2027). The Entity has established adequate and effective procedures for the control of OH&S. However, on-site observations during the Audit identified that some medicines were missing from the cutting workshop and a suspension crane in the moulding workshop lacked an anti-coupling device.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a safety committee to collect employee feedback on OH&S including suggestion boxes, congresses and irregular Worker interviews. Records have been retained since its establishment.
11.4 OH&S performance	Conformance	The Entity has established OH&S performance indicators and improvement measures. For example, in the annual OH&S promotion plan, there is a target implementation plan, and monthly statistics are made on the completion of the target.

Document Control and Version History

Revision	Date	Notes
0	30 March 2023	Initial Certification Audit – Full Certification
1	29 October 2024	Surveillance Audit