

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Dicastal UACJ Bolv (Tianjin) Extrusion Corporation

CERTIFICATE NUMBER
387

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE

14 NOVEMBER 2024

DATE OF EXPIRY

13 NOVEMBER 2027

CERTIFIED SINCE

14 NOVEMBER 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by 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

The Dicastal UACJ Bolv (Tianjin) Extrusion Corporation activities in the production of parts for the automotive, and industrial equipment. The Entity is located at NO.20,1 St Xinghua Branch Road, Xiqing Economic Development Area, Tianjin, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Dicastal UACJ Bolv (Tianjin) Extrusion Corporation
ENTITY NAME	Dicastal UACJ Bolv (Tianjin) Extrusion Corporation
CERTIFICATION SCOPE	The Dicastal UACJ Bolv (Tianjin) Extrusion Corporation activities in the production of parts for the automotive, and industrial equipment. The Entity is located at NO.20,1 St Xinghua Branch Road, Xiqing Economic Development Area, Tianjin, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-FabricationMaterial 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	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">17 - 19 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">5 July 2024
AUDIT SCOPE	<p>The Audit Scope included the Dicastal UACJ Bolv (Tianjin) Extrusion Corporation activities in the production of parts for the automotive, and industrial equipment. The Entity is located at NO.20,1 St Xinghua Branch Road, Xiqing Economic Development Area, Tianjin, China. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-FabricationMaterial Conversion <p>All relevant 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	14 November 2024 – 13 November 2027
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	13 May 2026
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CERTIFICATE NUMBER	387
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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

Dicastal UACJ Bolv (Tianjin) Extrusion Corporation (DUBEX) (the 'Entity') is a joint venture established at the end of 2021. It was formed through the integration of resources from CITIC Group's CITIC Bohai Aluminum Industries Holding Co., Ltd., CITIC Dicastal Co., Ltd., and UACJ Group from Japan. The Entity leverages global collaborative resources and advanced Aluminium processing technologies to meet the demands of various sectors, including automotive and industrial equipment.

The core business of the Entity focuses on producing Aluminium alloy products designed for lightweight automotive applications. This includes components such as crash beams, energy-absorbing boxes, door sill beams, sub-frames, and battery cases. They also manufacture flat tubes for automotive heat exchangers and air conditioning micro-channels.

The current production line specialises in creating various Aluminium profile products for automotive use, primarily utilised in car bumpers, frames, and similar applications. The Entity is located at No. 20, 1st Xinghua Branch Road, Xiqing Economic Development Area, Tianjin, China, and is part of the third phase of the XEDA Industrial Park. In 2023, their total production capacity exceeded 5,000 tons. They hold certifications for various standards, including IATF 16949, ISO 9001, and ISO 14001.

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 developed and implemented policies, systems, procedures, and processes to comply with the legal requirements. The legal compliance department is responsible for implementing applicable laws, regulations and other requirements within the organisation and conducts legal compliance reviews yearly. The Entity has fully identified the applicable laws, regulations, and other requirements, including customer requirements. There are no significant compliance issues within the Entity. Information regarding compliance performance is disclosed in the Annual Sustainability Report: https://www.dubex.top/upload/202406151307162272.pdf
1.2 Anti-Corruption	Conformance	The Entity has implemented policies and processes, such as the Anti-Corruption Management Procedure, to identify and prevent corruption. The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing standards. According to registers of misconduct and periodical internal control audit reports, no corruption cases were reported in 2023 and 2024.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes environmental, social, and governance performance principles. The Entity implemented adequate measures, including training and communication, to raise awareness of the code among employees, business partners and suppliers. A formal review of the Code of Conduct is conducted annually, and the Entity commits to reviewing the Code of Conduct's effectiveness to see if any significant changes to the business affect environmental, social, and governance risks or indicate control deficiencies. The Code of Conduct is available at: https://www.dubex.top/upload/202405271622311531.pdf and https://www.dubex.top/upload/202405241601072031.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented a comprehensive ASI Management Policy, which includes an Environmental Policy, Human Rights Policy, Health and Safety Policy, and Responsible Procurement Policy. The policies have been communicated to all employees and stakeholders through public disclosure. The Entity reviews its policy's effectiveness annually or if any significant changes to the business affect environmental, social, and governance risks or indicate control deficiencies.
2.2a-c Leadership	Conformance	The Entity has named the General Manager the ASI management representative. The management representative is responsible for establishing and implementing ASI standards within the Entity and communicating ASI policies. A cross-departmental ASI working group has been established to implement ASI standards within the Entity.
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	Conformance	The Entity has implemented a Social Management System in accordance with the ASI Performance Standard, including assessment

CRITERION	RATING	COMMENT
Systems - Social		of social impact and relevant risks, such as risks related to human rights, occupational health and safety, and business ethics, which are identified and assessed.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented policies, systems, procedures and processes that meet responsible sourcing requirements. The Entity conducts second-party Due Diligence Audits at major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on responsible sourcing requirements annually. The purchasing policies can be found in the Entity's ASI Policy at: https://www.dubex.top/upload/202406171528178901.pdf . The Entity reviews its policy's effectiveness annually or if any significant changes to the business affect environmental, social, and governance risks or indicate control deficiencies.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Entity has implemented an ISO14001 Management System, and environmental aspects, health and safety risk and control plans are reviewed annually. According to the Entity's ASI Management Procedures, the Entity commits to regularly review the environmental and social impact management plan, with a minimum review frequency of once every five years. Additionally, a reassessment of the Environmental and Social Impact Management Plan is initiated when there are business changes or signs of any control gaps leading to significant environmental, social, and governance risks. Since March 2020, the Entity has not undertaken any new construction projects or significantly changed existing facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Entity has implemented documented procedures and a Human Rights Management Plan to identify and assess the risks to Human Rights and business ethics. It establishes the relevant control measures based on the ASI Performance Standard and associated legal requirements. Human Rights Impact Assessment Report and Management Plans are publicly disclosed at: https://www.dubex.top/upload/202406121307511975.pdf Except for the annual review, top management commits to reviewing the management plans after any changes to the Business that alter Material Human Rights risk(s) and if there is any indication of a control gap. The Entity has not undertaken any new construction projects or significantly changed existing facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented Emergency Response Plans as part of its management processes. The audit process verifies the training of emergency response personnel and the execution of drills. The environmental emergency plans have been formally registered with relevant government agencies and are publicly disclosed on the Entity's official website. The plan can be downloaded from the following link: https://www.dubex.top/upload/202405211517273726.pdf and https://www.dubex.top/upload/202405211514356049.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a procedure of Provisions for decision-making and administration of critical business matters to address situations where it may have to suspend or significantly alter its operations due to factors outside its control. The Entity simultaneously commits to obeying the applicable law and its policies on layoffs and consulting employee organisations. The suspension process and management procedure is reviewed annually. No suspension activity

CRITERION	RATING	COMMENT
		has happened in the last three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the Mergers and Acquisitions Procedure (Investment and Construction Projects Management Procedure) based on the ASI Performance Standard requirement. The Entity's top management commits to conduct Due Diligence in case of mergers or acquisitions. It also reviews its environmental, social and governance practices related to ASI Performance Standard, including those associated with Historic Aluminium Operations. No such activity has happened in the last three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Closure, Decommissioning and Divestment Procedure (Provisions on decision-making and administration of critical business matters) based on the ASI Performance Standard requirements. The Entity's top management commits to reviewing its environmental, social, and governance practices in case of closure, decommissioning, and divestment, as well as developing a plan for monitoring environmental, social, and governance impacts. No such activity has happened in the last three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has implemented a materiality screening process, and the key concerns of stakeholders are identified, such as air pollution, hazardous waste management, etc. The management approach and performance information of material issues are disclosed in the annual Sustainability and Social Responsibility Report at: https://www.dubex.top/upload/202406151307162272.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its Annual Sustainability Report. No significant fines or penalties on the Entity were reported in 2023. Sustainability Report disclosures can be found via the following link: https://www.dubex.top/upload/202406151307162272.pdf
3.3a-c Payments to Governments	Conformance	The Entity only makes or has made payments to governments on its behalf on a legal and/or contractual basis. Payments to governments are transparently reported in their annual Sustainability Report: https://www.dubex.top/upload/202406151307162272.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaints/Grievance Mechanism, and the complaint resolution process is specified in the Management Procedure. No significant complaint has been received until now. Complaints/grievances/stakeholders' concerns and resolution approaches are reviewed annually in the Entity's ASI management review meetings. The Entity commits to reviewing the resolution of the complaint after any changes to the Business that alter Material environmental, social, and governance risks and if any indication of a control gap occurs.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life	Minor Non-	The Entity has conducted an Environmental Life Cycle Assessment considering the Cradle-to-Gate Life Cycle impact of its main products.

CRITERION	RATING	COMMENT
Cycle Assessment	Conformance	The Environmental Life Cycle Assessment report is published at: https://www.dubex.top/upload/202405290932504321.pdf However, the Entity's Environmental Life Cycle Assessment report incompletely disclosed some evaluation results, such as the inconsideration of acidification trends and relevant information on sensitivity analysis.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Cradle-to-Gate Life Cycle impact of the Entity's main products is assessed; the Entity has developed an LCA Report following the principles regulated in ISO 14040 and ISO 14044. The Report discloses key information about the LCA, such as underlying assumptions, system boundaries, etc. The report is available via: https://www.dubex.top/upload/202405290932504321.pdf
4.2 Product Design	Conformance	The Entity does not engage in product design and development. However, it does make efforts to improve its production processes to reduce resource consumption and waste generation. For instance, one of the quality objectives is the yield rate of each process to reduce cost.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects, recycles, and reuses all process scraps and nonconforming products. The target for process scraps is 100% recycling, and the recycling records show that the target has been achieved.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has developed a strategy to utilise recycled Aluminium, planning to utilise 2500 tons of recycled Aluminium in 2024 and 3000 tons of recycled Aluminium in 2025 and increase the use of recycled Aluminium year by year. The ultimate target in 2030 is the consumption of recycled Aluminium, which can reach 30% of the total raw material the Entity consumes yearly. The Entity commits to reviewing the achievement of the recycled Aluminium target annually, adjusting the strategy, target, and plan regarding recycled Aluminium after the management review meeting. The recycling strategy is publicly disclosed on the Entity's at: https://www.dubex.top/upload/202405271622316524.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has plans to utilize 2500 tons of Recycled Aluminium in 2024 and 3000 tons of Recycled Aluminium in 2025 and increase the use of Recycled Aluminium annually. The ultimate target in 2030 is the consumption amount of recycled Aluminium can reach to 30% total of the raw material yearly consumption of the Entity. The factory contracts with upstream suppliers to agree on the amount of recycled materials to be used. There is not the complete local, regional or national collection and recycling systems for Aluminium Scraps in China, the Entity is working with the customer to decide how to improve the recycling rate of products at end-of-life. However, the Entity does not present a recycling strategy demonstrating engagement with its suppliers to purchase its Recycled Aluminium proportion and other alternatives.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has established a Management Procedure for GHG Emission calculation and compiles the GHG emission reports in 2023. The

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		Entity's GHG emissions in Scope 1 and 2 and the major emissions in Scope 3 are calculated according to the chosen protocol. A 3rd party company verifies the GHG emission calculation report and issues the verification certificate. The Entity publicly discloses the GHG emission calculation report, report verification and certificate on its website: https://www.dubex.top/upload/202405240905073703.pdf
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	The Entity has established its GHG Emission reduction targets in compliance with commitments to green and low-carbon development, consistent with a 1.5°C warming scenario. The Entity's sites defined a GHG Emission Reduction Plan, including its pathway, which is reviewed annually and is publicly disclosed at: https://www.dubex.top/upload/202405240858477380.pdf However, the Entity has set its 2028 emission reduction targets for Scope 1 and 2 and Scope 3, and its current metrics do not align with the ASI Entity GHG Pathways Method.
5.4 GHG Emissions Management	Conformance	The Entity has implemented measures into its Management Systems to identify, control, and manage its GHG emissions as defined in its GHG Emission Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity identifies, assesses and quantifies its Material Emissions to Air from its activities. Control Plans to minimise exposure to and impacts from Emissions to Air are implemented, and the Entity monitors its effectiveness periodically through periodical reviews, and in case of major change or nonconformance is found. The Entity's Emissions to Air Reduction Plan and its environmental performance are publicly disclosed at: https://www.dubex.top/upload/202406121307515267.pdf
6.2a-g Discharges to Water	Conformance	The wastewater sources are sanitary water, recycled cool water, and the process of cleaning. The wastewater is collected and treated following the requirements in the approved EIA report. The Material discharges to water, the target and the management program are published at: https://www.dubex.top/upload/202406151302268043.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed its risk areas where Spills and Leakage may contaminate air, water and soil. The relevant management plan is established and implemented. The Entity periodically reviews the plans and, if needed, after a spill/leakage event or major business change. The Spill and Leakages Risk Assessment Report is disclosed at: https://www.dubex.top/upload/202405211519462824.pdf . The Entity's latest version of its Emergency Response Plan for environment incidents is disclosed on its website:

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		https://www.dubex.top/upload/202405211514356049.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity defines how to report the spills/leakage in the Environmental Protection Management Procedure. The sites are required to report accidents to the local government agency and the affected parties. No spill/leakage happened in the past three years. The latest version of the management plan is disclosed on the Member's official website at: https://www.dubex.top/upload/202405211514356049.pdf
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity implemented a waste management strategy in accordance with the waste mitigation hierarchy. The Entity mitigates the material impacts by reusing and recycling the waste. The disposal of hazardous waste is in compliance with the applicable legal requirements. The Entity's quantities of Hazardous and non-hazardous waste generated from its activities in 2023 are disclosed at: https://www.dubex.top/upload/202405271326595525.pdf . However, the weight of the waste lye stored in the hazardous waste warehouse is not written on the label.
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.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity identifies and documents its water withdrawal and use by source and type in the Environmental Impact Assessment. The Entity has assessed its water-related risks, considering the surrounding water environment, water withdrawal and discharge, including the effectiveness of the existing management measures. The Entity's risks were deemed low, and no material significant water-related risks exist in the Entity's Area of Influence. The Entity's Assessment Report on Water-Related Risks and Water Inventory Map is published at: https://www.dubex.top/upload/202405211512419755.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as the water risks were deemed low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located in the industrial area planned by the local government and has an effective Environmental Management System. A qualified third party conducted an Environmental Impact Assessment (EIA), stating that the Entity's Biodiversity and Ecosystem Services Risks and Impacts are low. The EIA reports are approved by the local Environment Protection Agency, and no biodiversity-sensitive areas exist in the Member's area of influence.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable as the Biodiversity and Ecosystem Services Risk and Impact were deemed low.

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8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as the Biodiversity and Ecosystem Services Risk and Impact were deemed low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as the Biodiversity and Ecosystem Services Risk and Impact were deemed low.
8.4 Alien Species	Conformance	The Entity identifies the risks of introducing Alien Species into its operations and logistic activities and assesses whether the activities could adversely impact Biodiversity and Ecosystem Services. The assessment results have deemed the risks to be low.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity commits not to explore, develop new projects or make major changes in World Heritage Properties. There are no World Heritage Properties in the Entity's area of influence.
8.6a-d Protected Areas	Conformance	The Entity commits to protecting the Environment as per its Management Manual. No protected areas are within the Member's area of influence.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has formulated a Code of Conduct, affirming its commitment to uphold Human Rights, promote gender equality, and adhere to the UN Guiding Principles on Business and Human Rights. The Entity consistently publishes its Human Rights Impact Assessment Report, which details the approach to engaging with affected communities and the mechanisms for resolving complaints. Based on the Entity's annual Human Rights Impact Assessment Report (https://www.dubex.top/upload/202406121307511975.pdf), records from management review meetings, and stakeholder grievance records, the Entity's operations have not resulted in or contributed to any significant adverse Human Rights impacts. Nevertheless, should any negative impact on Human Rights be identified or reported, the Entity pledges to provide appropriate remedies or cooperate through legitimate processes. The Entity's Code of Conduct can be accessed via: https://www.dubex.top/upload/202405271622311531.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established and implemented a comprehensive Management Procedure to protect female employees, demonstrating its commitment to upholding and promoting Gender Equity and women's empowerment. The Entity has made public disclosures regarding its gender equity Policy and performance in safeguarding the rights of female workers. The commitment to gender responsiveness is publicly disclosed at: https://www.dubex.top/upload/202405271622313594.pdf .
9.3a-i Indigenous Peoples	Not Applicable	The Entity has established and implemented policies and processes to ensure respect for indigenous people's rights and interests. As per the assessment report and definition specified in the ASI PS standard, no indigenous peoples are within the Entity's Area of Influence.

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9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Conformance	The Entity has developed a robust stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for all new projects and significant modifications to existing projects. Within this process, the Entity is dedicated to engaging in meaningful consultation and cooperation with the Indigenous Peoples, respecting their representative institutions, and seeking their Free, Prior, and Informed Consent. Currently, no Indigenous Peoples reside within the area of influence of the Entity.
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's Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has a procedure for identifying cultural and Sacred Heritage and conducting risk assessments to reduce the impact on these sites. At present, all of the Entity's new or existing projects have undergone EIA and Social Assessment, and there are no Sacred or Cultural Heritage sites in the area of the Entity's influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity as there is no Sacred or Cultural Heritage within the Entity's area of influence.
9.6a-i Displacement	Conformance	The Entity is located in an industrial zone developed by the local government. No resettlement is required as no new project have been developed since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a stakeholder engagement process to actively identify and address the primary concerns of the affected population and organisations. To effectively respond to these concerns, the Entity has developed a range of plans, which are reviewed annually, and any necessary improvements are identified and implemented. The Entity's performance in executing these plans and actions is transparently disclosed in its 2023 annual Sustainability Report: https://www.dubex.top/upload/202406151307162272.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established Management Systems, including a Supply Chain Policy, responsibilities and resources, information gathering, and supplier engagement. The Supply Chain Policy and commitments to responsible resources, including Grievance Channels, are specified in the Responsible Procurement Policy, which is publicly available at: https://www.dubex.top/upload/202406171528178901.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity conducts regular risk assessments to identify and evaluate potential risks within its supply chain. It is important to note that the Entity does not utilise conflict minerals and ensures that no materials are sourced from Conflict-Affected and High-Risk Areas. Furthermore, the Entity is committed to addressing critical Human Rights issues, such as Child Labour and Forced Labour, and ensures that they are not present within its supply chain. However, in the Supplier Audit Report, the factory didn't assess 2 out of 21 Suppliers whether their supply chains are located in and sourcing from/producing in conflict-

CRITERION	RATING	COMMENT
		affected or other high-risk areas, and the practice on topical of conflict material is not publicly disclosed.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a conflict minerals and supply chain management program and commits to taking actions such as suspending cooperation, returning goods, and imposing penalties to eliminate the risk of using conflict minerals within its supply chain. No conflict minerals are used, and no materials are from the Conflict-Affected and High-Risk Areas, no critical Human Rights issues such as child labour/forced labour.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has developed and implemented a comprehensive supply chain Code of Conduct, including social responsibility provisions. As part of its commitment to responsible sourcing, the Entity conducts regular audits of its supply chain to assess compliance with the Code of Conduct and determine if conflict minerals are used in products or production processes. The risk assessment records and supplier audit reports confirm no critical issues have been identified and that there is no evidence of conflict minerals being used in the supply chain. The risk associated with conflict minerals is assessed as low. Nevertheless, the Entity maintains a continuous improvement plan to enhance its practices further and ensure ongoing adherence to responsible sourcing principles.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has successfully implemented its ASI Code of Conduct throughout its supply chain. It has conducted risk assessments and social responsibility audits to ensure compliance. The Entity is committed to ensuring that no conflict materials are used in its entire supply chain and that no materials are sourced from Conflict-Affected and High-Risk Areas. However, a minor nonconformance was issued that the relevant information and practice performance on supply chain Due Diligence, especially the practice on conflict material, are not publicly disclosed.
9.9 Security practice	Conformance	The Entity's security guards are hired directly by the Entity, which commits to respecting Human Rights in security activities. No body searches are permitted, and security guards shall work humanely. All security guards understand their tasks and how to respect Human Rights. No grievance or complaint against security activities has been received until now.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Entity's top management commits to respecting the right to Freedom of Association and Collective Bargaining. All the Entity's employees have joined the trade union, and regular meetings between the trade union and top management are conducted to discuss and negotiate the rights and benefits of employees. The trade union chairman, committee members, and employee representatives are all freely elected by employees.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's top management commits to respecting the right to freedom of Association and Collective Bargaining. Workers' representatives are freely elected by employees every five years, and a worker representative congress meeting is regularly held once a year. In these meetings, workers communicate and discuss their

CRITERION	RATING	COMMENT
		concerns with top management. There is no collective bargaining agreement in the Entity.
10.2a-c Child Labour	Conformance	The Entity has established a Policy stating its commitment against Child Labour, which is prohibited in China. The legal minimum working age in China is 16 years old. There is no Child Labour or young workers in the Entity.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a comprehensive Policy that strictly prohibits Forced Labour, including human trafficking. This Policy applies not only to the Entity itself but also to its suppliers, emphasising the importance of compliance with the prohibition of Forced Labour, slavery, and human trafficking. No instances of illegal wage deduction, debt bondage, pay for a debt, or any other form of Forced Labour have been identified or reported within the Entity. This demonstrates the Entity's commitment to ensuring fair and ethical labour practices. More information is available in the Entity's Code of Conduct and Responsible Procurement Policy: https://www.dubex.top/upload/202405271622311531.pdf</p> <p>The Entity also publicly disclosed its Antislavery and Anti-Trafficking Statement and its actions to address Modern Slavery on its website: https://www.dubex.top/upload/202405271622319361.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. The recruitment advertisement and the training plan indicate the Entity's decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The interviewed workers confirm they feel equal in the Entity. No case of discrimination has been received to date.
10.5 Communication and engagement	Conformance	The Entity provides direct and frequent communication with the workers and their representatives. Its communication channels are announced to the workers, and the workers know how to raise complaints and concerns regarding working conditions. Workers are provided with resolution of workplace and compensation issues without the threat of reprisal, intimidation, or harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented policies stating that harassment or bullying is not accepted. The disciplinary measures are approved in the worker representative meeting, comply with legal requirements and require the confirmation of the involved worker. An information brochure has been developed and distributed to all employees. The Entity's Code of Conduct is clear on this issue, and regular employee training is performed. The Code of Conduct is available at: https://www.dubex.top/upload/202405271622311531.pdf</p> <p>Human Rights and Business Ethics Policy: https://www.dubex.top/Upload/ASI%E5%8A%B3%E5%B7%A5%E5%92%8C%E5%95%86%E4%B8%9A%E9%81%93%E5%BE%B7%E6%96%B9%E9%92%88.pdf</p>
10.7a-d Remuneration	Conformance	The Entity has issued labour contracts to all employees, where the terms and conditions are clearly defined. The labour contracts specify the employee's probationary period, contract duration, basic salary, and calculation of overtime pay, among other provisions. The wage structure is clearly defined, and the basic wage is above the local legal minimum wage. The compensation for the overtime work meets

CRITERION	RATING	COMMENT
		the legal requirements. The mandatory allowances are provided to the workers. All employees enrol in the mandatory social insurance scheme. The payment of wages is documented and timely paid to all workers by bank transfer on the 25th of the following month.
10.8a-c Working Time	Conformance	Working hours are recorded accurately, and the regular working hours for office staff are 8 hours a day and five days a week. In the production department, most workers implement four groups and three shifts working system, 8 hours per day per shift; workers work six days in a row and have two days' rest; the shifts are switched every two days. Working hours are monitored control, all workers' monthly overtime working hours do not exceed the legal monthly limit, and all workers have one day off per seven-day period. Workers' workday does not exceed 8 hours on average over six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its workers of their rights, as protected in this principle and has established cooperation and communication with the workers at all its production plants. National laws and regulations in China are respected and complied with.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	Occupational Health and Safety Policy is established, approved by the top management, implemented, reviewed periodically and communicated with stakeholders. The Policy is published at: https://www.dubex.top/upload/202405240822222417.pdf https://www.dubex.top/upload/202405231344356936.pdf However, the expiry dates for the respiratory PPE equipment were not marked, and there were no records for filter maintenance as per legal requirement.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically reviews its OH&S Management System through monthly safety meetings, annual legal compliance evaluations, annual internal audits against ISO 45001:2018, and management review meetings. When any indication of a control gap is shown, the review is conducted to assess if the potential corrective and/or preventive actions should be implemented. The KPIs (objectives/targets) of the OH&S Management System include Leading and lagging indicators. The achievement of OH&S objectives/ targets in 2023 and the comparative analyses of performance with peer Businesses and leading practices are published at: https://www.dubex.top/upload/202406131104333105.pdf and https://www.dubex.top/upload/202406151307162272.pdf
11.2 Employee engagement on Health and Safety	Conformance	Per the register of complaints and advice from workers, all concerns and advice on OH&S issues raised by workers are investigated and analysed, and action is taken if needed. The Health and Safety Committee, including the workers' representatives, holds a quarterly meeting to discuss the OH&S issues raised by workers and takes action if needed.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	14 November 2024	Initial Certification Audit - Full Certification
