

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Ningbo Xusheng Group Co., Ltd.

CERTIFICATE NUMBER

408

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

8 JANUARY 2025

DATE OF EXPIRY

7 JANUARY 2028

CERTIFIED SINCE

8 JANUARY 2025

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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 Group Headquarters, Factory 5,
6 and 7 of Ningbo Xusheng Group
Co., Ltd., located in Ningbo, China
and manufactures Aluminium alloy
parts.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ningbo Xusheng Group Co., LTD
ENTITY NAME	NINGBO XUSHENG GROUP CO., LTD.
CERTIFICATION SCOPE	The Group Headquarters, Factory 5, 6 and 7 of Ningbo Xusheng Group Co., Ltd., located in Ningbo, China and manufactures Aluminium alloy parts.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion
ASI STANDARD	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">• 2 - 5 September 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 16 October 2024
AUDIT SCOPE	<p>The Audit Scope included the main production processes of Aluminium alloy ingot casting, forging, extrusion and CNC machining at Ningbo Xusheng Group Co., Ltd. – Headquarters, Factory 5, 6 and 7.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material 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 8 January 2025 – 7 January 2028

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 7 July 2026

CERTIFICATE NUMBER 408



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

Ningbo Xusheng Group Co., Ltd. (the 'Entity') was established in 2003 and is headquartered in Ningbo, China, and operates three main divisions: die casting, forging, and extrusion integration. The Entity specialises in electric drive systems, electronic control systems, battery systems, chassis suspension systems, and high-performance body systems for new energy vehicles.

The Entity which encompasses the Group Headquarters as well as Factory 5, Factory 6, and Factory 7, focuses on the main production processes including Aluminium alloy ingot casting, forging, extrusion, and CNC machining. Its key products consist of automotive Aluminium alloy beams, various types of casings, and valve bodies. The Entity's area is free of settlements, schools, cultural landmarks, water bodies, nature reserves, and other significant Biodiversity features.

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	High	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 legal requirements. The legal compliance department oversees the implementation of Applicable Laws, regulations, and other requirements within the Entity, and conducts annual legal compliance reviews. All relevant legal and regulatory obligations have been thoroughly identified, and no significant compliance issues have been reported. Compliance performance is disclosed in the Annual Sustainability Report at: https://www.nbxus.com/uploads/files/3.1.pdf
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Policies and procedures to including the Anti-Commercial Bribery Management Program to prevent and address Corruption. Complying with Applicable Laws and regulations, it combats Corruption in all forms, including Extortion and Bribery. Personnel in high-risk positions receive targeted training and must sign an Anti-Corruption Commitment. Regular evaluations of Anti-Corruption measures are conducted, and internal audit reports confirm no Corruption cases in 2023 and 2024.
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented a Code of Conduct outlining principles for environmental, social and governance (ESG) performance. Measures such as training and communication are in place to raise awareness of the Code among employees, business partners, and suppliers. The Code is formally reviewed annually, and the Entity commits to reassessing its effectiveness and compliance when significant business changes affect ESG risks or when control gaps are identified. The Code of Conduct is accessible to all stakeholders on the Entity's official website: https://www.nbxus.com/uploads/files/1.3.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented the ASI management Policy encompassing environmental, Human Rights, Health and Safety and responsible procurement Policies. The Policy is communicated internally to all employees and externally to Stakeholders on the Entity's official website: https://www.nbxus.com/uploads/files/2.1.pdf The Entity commits to reviewing the Policy annually and whenever significant changes in Business operations affect environmental, social, and governance risks or reveal control gaps.
2.2a-c Leadership	Conformance	The General Manager Assistant, as a member of top management and the ASI Management Representative, oversees the establishment and implementation of ASI standards and is responsible for communicating ASI Policies within the Entity. A cross-departmental ASI working group has been formed to implement these standards and employees are informed of ASI Policies and procedures through various training programs.
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.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	A Social Management System complying with the ASI Performance Standard has been established and implemented. Social impacts and risks, including those related to Human Rights, Occupational Health and Safety (OH&S), and business ethics, are identified and assessed. Management measures to prevent or mitigate these impacts have been developed and implemented.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that meet the responsible sourcing requirements. It conducts third-party Due Diligence audits at major suppliers' sites to qualify them. The procurement team and relevant personnel receive annual trainings on these requirements. The Entity's Responsible Sourcing Policy is available at: https://www.nbxus.com/uploads/files/2.4.pdf According to the Entity's ASI documented management procedure, the Responsible Source Policy is reviewed periodically in management review meetings and whenever significant changes occur in environmental, social, or governance risks, or if control gaps are identified. However, the Entity's supplier Due Diligence audit checklist does not cover the full range of ASI Performance Standard requirements.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable as the Entity does not have any New Projects or Major Changes.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity establishes and implements documented procedures to identify, assess risks related to Human Rights and business ethics, establishing control measures based on the ASI Performance Standard and relevant legal requirements. A feasibility analysis for its 2022 project included a Human Rights impact assessment, which concluded that the associated risks are extremely low. The Human Rights Impact Assessment report and management plans are publicly available on the Entity's official website: https://www.nbxus.com/uploads/files/2.61.pdf and https://www.nbxus.com/uploads/files/2.62.pdf In addition to the annual review, the Entity's top management team commits to reviewing the management plans whenever there are changes to the Business that affect Material Human Rights risks or indicate a control gap.
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certifications. It has developed and implemented emergency response plans as part of its management processes. The audit verifies the training of emergency personnel and the execution of drills. Environmental emergency plans are registered with relevant government agencies and publicly available on the Entity's website at: https://www.nbxus.com/uploads/files/2.71.pdf https://www.nbxus.com/uploads/files/6.36.41.pdf and https://www.nbxus.com/uploads/files/6.36.42.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a procedure for environmental, social, and governance management in the Entity's closure, decommissioning, and divestment to address situations where operations may need to be suspended or significantly altered due to external factors. The Entity is committed to complying with Applicable Laws and company

CRITERION	RATING	COMMENT
		Policies on layoffs while consulting employee organisations. The suspension process will be reviewed annually and in response to any material ESG risks arising from Business changes or potential control gaps. No suspension has occurred in the past three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Mergers and Acquisitions Management Procedure in accordance with the ASI Performance Standard. Top management commits to conducting Due Diligence for any future Mergers or Acquisitions, ensuring compliance with the environmental, social, and governance practices outlined in the ASI Performance Standard, including those related to historic Aluminium operations. As a listed company, no such instances have occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for Closure, Decommissioning, and Divestment in compliance with the ASI Performance Standard. Top management commits to reviewing ESG practices related to this Standard during future closure, decommissioning, and divestment planning, if applicable, and developing a plan to monitor significant ESG impacts. The Entity is a listed company, and no such instances have occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity implements a materiality screening process to identify key Stakeholder concerns, such as air pollution and hazardous waste management. The management approach and performance on Material issues are disclosed in the annual Sustainability Report, publicly at: https://www.nbxus.com/uploads/files/3.1.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses significant fines, judgments, penalties, and non-monetary sanctions for non-compliance with Applicable Law in its Annual Sustainability Report. The Entity's 2023 Report indicates no significant fines or penalties were imposed.
3.3a-c Payments to Governments	Conformance	The Entity only makes payments to governments on a legal or contractual basis, either directly or through representatives. These payments are reported in the annual Sustainability Report, available at: https://www.nbxus.com/uploads/files/3.1.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>A Complaints and Grievance handling mechanism has been established and implemented. The Complaint Resolution process is outlined in the management procedure and is available at: https://www.nbxus.com/uploads/files/3.41.pdf and https://www.nbxus.com/uploads/files/3.42.pdf</p> <p>An email address has been designated for both internal and external Stakeholders to submit Complaints and feedback. To date, no significant Complaints have been received.</p> <p>Complaints, Grievances, and Stakeholder concerns, along with their resolutions, are reviewed annually in the ASI management review meeting. The Entity commits to reassessing the Complaint Resolution process following any changes to the Business that impact Material</p>

CRITERION	RATING	COMMENT
		environmental, social, or governance risks, or if any control gaps are identified.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its main product series, following international standards of ISO 14040 and ISO 14044. The LCA was performed using the Simapro Life Cycle Assessment software and data from the Ecoinvent 3.9 database.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's publicly disclosed LCA Report offers LCA data for its products from cradle to gate. The Entity commits to sharing the full environmental LCA Report externally. The disclosed Report includes relevant LCA information, such as basic assumptions, system boundaries, and associated data. The LCA Report can be accessed at: https://www.nbxus.com/uploads/files/4.11.pdf https://www.nbxus.com/uploads/files/4.12.pdf and https://www.nbxus.com/uploads/files/4.13.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable as the Entity is not involved in product design or development, with these responsibilities solely held by the customers.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has set a target of 100% collection, recycling, and/or reuse of Process Scrap, supported by a Scrap management procedure to ensure this goal is met. To minimise Aluminium Process Scrap, the Entity has implemented technological and management measures in its operations. All Scrap is collected, recycled internally, and sent for remelting and reutilisation. The Entity uses three series of alloys across forging, extrusion, and die-casting processes, with Scrap identified and segregated for recycling at each stage.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has developed a strategy to utilise recycled Aluminium, with aiming for 40% of its production to be made from recycled Aluminium by 2037. The Entity commits to annually reviews of progress towards these targets, adjusting strategies and plans based on management reviews. The recycling strategy is publicly available at: https://www.nbxus.com/uploads/files/4.4.pdf However, the Entity's strategy lacks clarity on how activities like procurement and R&D will support plan implementation.
4.4d Collection and Recycling of Products at End of Life	Conformance	As China lacks a well-developed system for collecting and recycling Aluminium Scrap at local, regional, or national levels, the Entity plans to collaborate with customers to improve the recycling rate of end-of-life products.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has calculated the Material EHG emissions within the defined boundary for 2023, including scope 1, scope 2, and relevant scope 3 emissions, such as those from purchased raw materials and transportation. The GHG Emission Report for 2023 is third-party verified, and the Report and the Verification Statement are available at: https://www.nbxus.com/uploads/files/5.1.pdf

CRITERION	RATING	COMMENT
		and https://www.nbxus.com/uploads/5.100.pdf However, the emission factors used for Scope 1 and Scope 2 emissions are not disclosed, and the emission factors for relevant Scope 3 emissions are based on IPCC data rather than supplier-specific information.
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	Conformance	The Entity has established a GHG Emission Reduction Plan, including targets and strategies. The plan and pathway are publicly disclosed in the Entity's 2023 Sustainability Report, page 32: https://www.nbxus.com/uploads/files/3.1.pdf The Reduction Plan and Pathway align with the ASI GHG Pathway Method's determined slopes. An annual review mechanism is in place to assess the GHG Emissions Reduction Plan and adjust the Pathway as necessary.
5.4 GHG Emissions Management	Conformance	To implement the GHG Reduction Plan, the Entity has established and implemented management processes to enhance energy efficiency and minimise Waste in daily operations and specific projects. The progress toward GHG reduction targets is reviewed periodically.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	In accordance with the Environment Management System and legal requirements, the Entity has identified, assessed, and quantified Material air emissions from its activities. The Entity has implemented control plans to minimise exposure to and impacts from air emissions, monitored their effectiveness periodically, and reviewed the plans regularly or when significant changes or non-Conformances occur. The air emission reduction targets and control plan are publicly available in the Entity's 2023 Sustainability Report, page 29: https://www.nbxus.com/uploads/files/3.1.pdf
6.2a-g Discharges to Water	Conformance	The Entity has complied with the Environment Management System and legal requirements by identifying, assessing, and quantifying Material discharges to water from its activities. Control plans have been implemented to minimise exposure and impacts, with periodic monitoring to evaluate effectiveness and regular reviews to address major changes or non-Conformance. Wastewater reduction targets and the control plan are publicly available in the Entity's 2023 Sustainability Report, page 26: https://www.nbxus.com/uploads/files/3.1.pdf

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Risk areas in operations where Spills or Leakages could contaminate air, water, or soil are assessed using the environmental management system's risk assessment process. A relevant management plan has been developed and implemented. The Entity periodically reviews the plan, including after Spill or Leakages or significant Business changes. The latest risk assessment and response plan is available at: https://www.nbxus.com/uploads/files/6.36.41.pdf and https://www.nbxus.com/uploads/files/6.36.42.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's Emergency Response Plan outlines procedures for reporting Spills and Leakages, including notifying affected populations and organisations. No spills or leaks have occurred in the past three years. The Entity's 2023 environmental performance is available at: https://www.nbxus.com/uploads/6.400.pdf
6.5a-c Waste Management and Reporting	Conformance	Waste management is a part of the environmental management system. The Entity has implemented a Waste management strategy aligned with the Waste mitigation hierarchy, focusing on recycling to reduce Material impacts. Hazardous Waste disposal is carried out in compliance with applicable legal requirements. The Entity has publicly reported the quantities of hazardous and non-hazardous Waste generated in 2023 at: https://www.nbxus.com/uploads/files/6.5.pdf The hazardous waste reduction target and control plan is available in the 2023 Sustainability Report, page 27 and 28: https://www.nbxus.com/uploads/files/3.1.pdf
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	Conformance	Dross is classified as hazardous Waste in China. The Entity complies with legal requirements for its collection, labelling, and storage, with no observed or reported Leakages. All generated Dross is transferred to licensed disposal suppliers approved by environmental protection authorities, and transfer information is reported accordingly. The Entity conducts annual reviews of the disposal processes. No landfill has been identified.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	In the Environmental Impact Assessment, the Entity has identified and documented its water use by source and type. It has evaluated water-related risks, considering the local water environment, withdrawal and discharge practices, and the effectiveness of existing management measures. The assessment concludes that the risk is low, with no significant water-related risks identified in the Entity's Area of Influence. The Water-Related Risks Report is available at: https://www.nbxus.com/uploads/files/7.17.2.pdf However, the information disclosed in the Report is inadequate.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the water-related risk assessment was rated as low.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Biodiversity and Ecosystem Services risk and impact assessments are part of the Environmental Impact Assessment (EIA) conducted by qualified third parties. The EIA Reports, approved by the local Environmental Protection Bureau, confirm that the Entity's Area of Influence contains no Biodiversity-sensitive areas. The three sites are located in industrial zones designated by local governments and operate under effective environmental management systems. No threatened species have been identified within the Entity's Area of Influence, resulting in a low risk level.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment rated the risks to Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as no Priority Ecosystem Services has been identified.
8.4 Alien Species	Conformance	The Entity has evaluated the risks of introducing Alien Species through its operations and logistics, assessing potential Material adverse impacts on Biodiversity and Ecosystem Services. The assessment concludes that the risk is low, and the Entity has neither intentionally nor unintentionally introduced Alien Species.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity commits not to explore or develop New Projects or make Major Changes within 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 comply with all regulations, and legal requirements related to Protected Areas and environmental protection. There are no Protected Areas in the Entity'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 established a Business Code of Conduct, committing to uphold Human Rights, promote gender equality, and comply with the UN Guiding Principles on Business and Human Rights. It regularly publishes the Human Rights Impact Assessment Report, detailing engagement with affected communities and Complaint Resolution mechanisms. According to the annual report, management reviews, and Stakeholder Grievance records, the Entity's operations have not caused significant adverse Human Rights impacts. If any negative

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		impact is identified, the Entity is committed to providing remedies or cooperating through legitimate processes.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a management procedure to protect female employees, demonstrating its commitment to gender equity and women's empowerment across the Entity. It has publicly disclosed its gender equity Policy and performance in safeguarding female Workers' rights, which are available in the Gender-Responsive Effectiveness Report at https://www.nbxus.com/uploads/files/9.2.pdf and in the annual Sustainability Report at: https://www.nbxus.com/uploads/files/3.1.pdf No gender equity-related Complaints have been received in the past three years.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has implemented a process to identify and assess Cultural and Sacred Heritage sites, ensuring minimal impact on them. All new and existing projects have undergone Environmental Impact Assessments and social assessments, which have confirmed that no such sites are within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable, as there are no Sacred or Cultural Heritage sites, nor Indigenous Peoples, lands, territories, or resources identified within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has implemented new project investment and development management procedures, requiring local authority approval for all projects. Currently, all existing projects are located in industrial zones developed by the local government. There are no Indigenous Peoples within the Entity's Area of Influence, no resettlement required, and no New Projects have been developed since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's annual Sustainability Report outlines its use of mechanisms such as Stakeholder communication, Human Rights Due Diligence, Environmental Impact Assessment and performance, supplier communication and management and community engagement to identify, prevent, monitor, mitigate, and communicate significant impacts from its activities, including Health and Safety, social and cultural rights, and environmental effects. The auditor's report in section 9.1 of the Sustainability Report indicates that the Entity has

CRITERION	RATING	COMMENT
		minimal impact on surrounding communities and organisations, with plans appropriately aligned to the Entity's scale, circumstances, and impact risks.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established Management Systems, including a supply chain Policy with defined responsibilities, allocated resources, information-gathering mechanisms, and active supplier engagement. The Entity's commitment to responsible sourcing is publicly outlined in the ASI Code of Conduct and the annual Sustainability Report, which are available at: https://www.nbxus.com/uploads/files/2.4.pdf and https://www.nbxus.com/uploads/files/3.1.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity regularly assesses risks within its supply chain, ensuring that no conflict minerals are used and that materials are not sourced from Conflict-Affected and High-Risk Areas (CAHRAs). The Entity is committed to addressing Human Rights concerns, such as Child Labour and Forced Labour, and ensures these issues are absent from its supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The risk assessment records indicate that the Entity does not use conflict minerals, source materials from CAHRAs, or have critical Human Rights issues such as Child Labour and Forced Labour in its supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has implemented a supply chain Code of Conduct, including social responsibility provisions. As part of its commitment to responsible sourcing, it regularly audits its supply chain to ensure compliance with the Code and verify that conflict minerals are not used in products or production processes. Risk assessment records and supplier audits indicate no critical issues or evidence of conflict minerals in the supply chain, with the associated risk deemed low. The Entity also maintains a continuous improvement plan to further enhance practices and uphold responsible sourcing principles.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has implemented the ASI Code of Conduct across its supply chain, conducting risk assessments and social responsibility audits to ensure compliance. It is committed to avoiding the use of conflict materials and ensuring that no materials are sourced from CAHRAs. However, although the Entity has publicly disclosed its procurement Policy on conflict minerals and supplier Due Diligence reports on its official website, the annual reports lack some relevant information and performance data related to conflict materials.
9.9 Security practice	Conformance	All security guards employed by the Entity are required to upholding Human Rights in their duties. Strict Policies prohibit body searches, and guards are required to perform their responsibilities in a humane manner. They receive comprehensive training to understand their obligations and the importance of respecting Human Rights. No Grievances or Complaints have been received regarding security conduct.

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of employee association through an employee representative committee. Representatives are freely elected, and a Worker council exists within the Entity. The representatives meet with management to address employee concerns.
10.2a Child Labour	Conformance	In compliance with Chinese law, Child Labour is strictly prohibited, with the legal minimum working age set at 16. The Entity has implemented Policies that explicitly ban Child Labour and safeguard young Workers. Currently, the Entity does not employ any Child Labour or young Workers. This commitment to protecting the rights and well-being of children is a core aspect of the Entity's operations.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking, which applies to both the Entity and its suppliers. This Policy ensures compliance with the prohibition of Forced Labour, Slavery, and Human Trafficking. No incidents of illegal wage deductions, debt bondage, or any other form of Forced Labour have been reported. Further details on the policy and its implementation are available in the Entity's Code of Conduct: https://www.nbxus.com/uploads/files/1.3.pdf and annual Sustainability Report: https://www.nbxus.com/uploads/files/3.1.pdf The Entity has outlined its actions to combat Modern Slavery in the Anti-Slavery and Anti-Trafficking Statement, available at: https://www.nbxus.com/uploads/files/10.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to promoting non-Discrimination across all operations. No Discrimination cases have been reported. This commitment is evident in the recruitment process, where job advertisements and training plans emphasise that decisions are based solely on a candidate's qualifications, without regard to personal characteristics. Feedback from interviewed employees further confirms that they feel equally treated and valued.
10.5 Communication and engagement	Conformance	Communication channels have been established between management, Workers, and their representatives. These channels are communicated to the workforce, allowing employees to express concerns and Grievances about working conditions and compensation, and seek resolutions without fear of retaliation or mistreatment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies that prohibit Harassment and bullying. To raise awareness, an informative brochure has been distributed to all employees. The Entity's Code of Conduct addresses this issue, and regular training sessions reinforce these principles. The Code of Conduct is available at: https://www.nbxus.com/uploads/files/1.3.pdf
10.7a-d Remuneration	Conformance	The wage structure is clearly defined, with the basic wage exceeding the local legal minimum. Overtime compensation fully meets legal requirements, and mandatory allowances ensure Workers' essential

CRITERION	RATING	COMMENT
		needs are met. All employees are enrolled in the mandatory social insurance program. Wages are promptly paid via bank transfer on the 25th of the following month and documented. Detailed information on wages, allowances, Overtime, and deductions is easily accessible through the internal system.
10.8a-c Working Time	Minor Non-Conformance	<p>Most production workshops operate on a three-shift rotation system with four teams. The day shift runs from 8:00 to 16:00, the night shift from 16:00 to 24:00, and the late-night shift from 00:00 to 08:00.</p> <p>Office staff work from 8:00 to 17:00, Monday to Friday, totalling 40 hours per week. Working hours are monitored, and most Workers' monthly Overtime stays within the legal limit, with one day off per week.</p> <p>However, around 5% of Workers do not get a day off after six consecutive working days, and around 1% of Workers exceeded an average of eight hours per day over the past six months.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their rights and fosters cooperation and communication across all production plants. It also complies with national laws and regulations in China.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity establishes, implements, maintains, and continually improves the OH&S Management System, with all sites holding valid ISO 45001:2018 certifications. Site observations, document reviews, and management and Worker interviews indicate that the effectiveness of the OH&S Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity periodically reviews the OH&S Management System through monthly safety meetings, annual legal compliance evaluations, internal audits against ISO 45001:2018, and management review meetings. If any control gaps are identified, a review is conducted to determine if corrective or preventive actions are necessary. The OH&S Management System include both leading and lagging indicators. A comparative performance analysis with peer Businesses and leading practices is available in the Entity's Sustainability Report: https://www.nbxus.com/uploads/files/3.1.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	All concerns and suggestions related to OH&S raised by Workers, as per the Complaint register and Workers' advice, are investigated, analysed, and addressed as necessary. The Health and Safety Committee, including Worker representatives, meets quarterly to review these issues and take appropriate action when needed.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 January 2025	Certification Audit – Full Certification
