

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ZHENGZHOU GUANDONG ALUMINUM INDUSTRY CO., LTD.

CERTIFICATE
NUMBER

331

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SHANGHAI
KYLIN
CERTIFICATION
SERVICE CO.,
LTD.

DATE OF ISSUE

18 DECEMBER 2024

DATE OF EXPIRY

17 DECEMBER 2027

CERTIFIED SINCE

24 JANUARY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H. ...', written over a light green background.

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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

Production facility of Gongyi Guandong Metal Technology Co., Ltd., engaged in production of Aluminium sheet and Aluminium coil, located in Gongyi City, Henan Province, China and the Sales Office of Zhengzhou Guandong Aluminum Industry Co., Ltd., located in Zhengzhou City, Henan Province, China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Zhengzhou Guandong Aluminum Industry Co., Ltd.
ENTITY NAME	Zhengzhou Guandong Aluminum Industry Co., Ltd.
CERTIFICATION SCOPE	Production facility of Gongyi Guandong Metal Technology Co., Ltd., engaged in production of Aluminium sheet and Aluminium coil, located in Gongyi City, Henan Province, China and the Sales Office of Zhengzhou Guandong Aluminum Industry Co., Ltd., located in Zhengzhou City, Henan Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (22 – 23 May 2023)Surveillance Audit (11 – 12 July 2024)
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">22 – 23 May 2023 (Initial Certification Audit)11 – 12 July 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 August 2023 (Initial Certification Audit)30 October 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (22 – 23 May 2023)</u></p> <p>The Audit Scope included the production facility of Gongyi Guandong Metal Technology Co., Ltd. and the Sales Office.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (11 – 12 July 2024)</u></p> <p>The Audit Scope included the production facility of Gongyi Guandong Metal Technology Co., Ltd.</p> <p>The supply chain activities included in the audit scope:</p>

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- Material Conversion (Production and Transformation)

All relevant 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

18 December 2024 – 17 December 2027

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

17 January 2026

CERTIFICATE
NUMBER

331

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Zhengzhou office functions as the sales department, and the Gongyi factory is a production factory and operates within a leased workshop from another business.</p> <p>The controller and legal representative of both companies is the same person. The Entity has appointed an ASI contact person as its regulatory collector, and the Compliance Evaluation Report indicates that all regulatory reviews are categorised. The General Manager manages labour and personnel compliance, EHS personnel manage environmental safety, and finance teams oversee finance and taxation. The Entity has listed relevant national laws and regulations in these areas. Annual Compliance Evaluation Reports show compliant results. A law firm serves as the Entity's legal advisor for production, management, business, and foreign affairs.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption and Anti-Bribery Control Procedure. The procedure prohibits all forms of Bribery and Corruption and prohibits illegal payments to the government. The Entity provides an Anti-Corruption Commitment Letter for sales and procurement positions, promising to abide by regulations and oppose Corruption. The Entity's Business Ethics Policy requires fairness, integrity and no unfair competition.</p> <p>The purchasing department can receive small gifts from suppliers, such as calendars and mooncakes which are usually worth tens or hundreds of yuan. Expensive gifts are not accepted. The Entity mainly exports to Europe and America, and occasionally provides inexpensive domestic handicrafts as souvenirs for foreign customers.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has developed the ASI Manual and Corporate Code of Conduct. The Code of Conduct stipulates the norms of employee behaviour and social responsibility affairs. The social responsibility section of the Code of Conduct requires employees to oppose Corruption, Extortion and Bribery, and act in accordance with the law. The Entity has committed not to use Child Labour, not to engage in Forced Labour, and to comply with labour laws</p>

CRITERION	RATING	COMMENT
		and regulations. The Entity provided performance data from the past year without any violations.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an integrated ASI Governance Policy which includes Social Responsibility Policy, Environmental Policy, Occupational Health And Safety (OH&S) Policy, Safety Management Policy, Business Ethics Policy, Governance Policy and Purchasing Policy.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policy has been approved and released by the General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The ASI Governance Policy has been disclosed on the official website of the Entity and posted in the office and workshop. During interviews with employees, it was found that they have a basic understanding of the ASI Policy. http://cn.zzgdalu.com/newsx/7.html
2.2 Leadership	Conformance	Two Management Representatives have been appointed, the General Manager and the Factory Manager. The Entity has provided the letter of appointment for the ASI Management Representatives, which states that the Management Representatives must implement the ASI Performance Standard and ensure conformance with the Standard requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established an ISO14001:2015 certified Environmental Management System.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained the ISO45001:2018 certificate. In addition, the Entity has established the following procedures Women's Labor Protection Policy, Anti-Discrimination Control Procedure, Child Labor Remediation Procedure, Prohibition of Forced Labor Control Procedure, Prohibition of Physical Punishment and Harassment Control Procedure, and Employee Complaint Handling Procedure. Worker interviews did not reveal any breaches of social responsibility procedures by the Entity.
2.4 Responsible Sourcing	Conformance	The Entity has established a Responsible Procurement Policy covering transparent transactions and fair and ethical business

CRITERION	RATING	COMMENT
		behaviours. Currently, the main suppliers are two Aluminium suppliers from the province, both of whom have signed a Supplier Commitment Letter with a commitment to self-discipline, integrity, and not purchasing raw materials from conflict minerals. The Entity has confirmed there were no supply chain integrity issues identified last year.
2.5 Impact Assessments	Minor Non-Conformance	The Entity is currently leasing a factory building and has applied for a new plot of land to construct its own new factory building. The Entity has established the New Project Impact Control Procedure and the Environmental Factor Identification and Evaluation Control Procedure. A newly purchased plot was levelled and the Entity provided on-site photos. It was however identified that the Impact Assessment for the new project has not yet been conducted.
2.6 Emergency Response Plan	Conformance	The Entity's Gongyi production Facility has established Emergency Response Plans, which addresses issues such as safety and fire prevention, evacuation of personnel at accident sites, electric shock, vehicle injuries and mechanical injuries. The facility has conducted fire drills. http://cn.zzgdalu.com/upload/file/20231111/2023111150533073307.pdf The Entity's Zhengzhou office has established a fire drill plan and collaborates with the property management of the office building to conduct drills on extinguishing fire sources and evacuation.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Merger and Acquisition Management Procedure, which requires Due Diligence on ESG issues in the case of Mergers and Acquisitions. The Entity is not currently involved in any Mergers or Acquisition activity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established the Regulations on Closure, Retirement, and Divestment Management Procedure which requires Due Diligence on ESG issues in the case of Closure, Decommissioning and Divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has prepared a 2023 Sustainable Development Report for both Zhengzhou Guandong and Gongyi Guandong. The Report

CRITERION	RATING	COMMENT
		<p>includes publicly disclosed data on various aspects, such as violations and responsibilities, payments to the government, Greenhouse Gas (GHG) emissions, air and water pollution emissions, Leakage reports, waste management and reporting, water use, risk disclosure, Biodiversity management, and Human Rights Due Diligence. Additionally, the Sustainable Development Report covers the overall implementation of social responsibility, including specific performance indicators for social responsibility, environmental performance, labour practices, Human Rights, and product performance.</p> <p>http://cn.zzgdalu.com/upload/file/20240712/2024071211160854854.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>In the past year, the Zhengzhou sales office and Gongyi production Facility did not receive any violations or penalties, as confirmed on the government credit website. The 2023 Sustainable Development Report discloses that the Entity has no record of violations or penalties. The director of the local Town Safety Supervision Office was interviewed, who confirmed there have been no records of punishments.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>Both the Zhengzhou sales office and Gongyi production Facility have paid corresponding taxes, surcharges, and social security fees to government departments in accordance with regulatory requirements. This was confirmed with the Entity's finance department and no other expenses have been paid.</p>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established an Employee Complaint Handling Control Procedure and the Stakeholder Complaint Appeal Handling Procedure. Zhengzhou employees can directly provide feedback to the General Manager, while factory employees based in Gongyi directly provide feedback via the factory suggestion box in the office. There are currently no records of employee complaints or grievances. The Entity has defined an effective appeals process which requires handling the appeals according to regulations. In the past year, there has been no feedback from other stakeholders. The official website of the Entity has published the complaint hotline and complaint mailbox. Interviews</p>

CRITERION	RATING	COMMENT
		with employees and the local village committee director revealed no complaints from nearby residents or relevant parties.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a Product Lifecycle Assessment (LCA) Report for Aluminium plates and a certificate of LCA report that demonstrates it is verified by a third-party.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report includes a product lifecycle study from cradle to gate, including energy consumption, waste emissions, and GHG emissions data for Primary Aluminium, Aluminium coils, transportation processes, and raw materials entering the Entity.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA report is publicly available on the Entity's official website: http://cn.zzgdalu.com/upload/file/20240912/20240912183896399639.pdf
4.2 Product design	Conformance	The Entity has developed a Product Design Impact Procedure. The program requires minimising losses and environmental impact during production. The Entity's products are Aluminium plates and Aluminium coils. There is no loss of Aluminium material in the surface cleaning of Aluminium coil. The width of the Aluminium plate is generally ordered according to the width of the customer's order, and then the Aluminium coil is processed into an Aluminium plate. Generally, each Aluminium coil only produces head and tail waste and unqualified Scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has developed a Waste Recycling Rate and Target Statistics form and set a 100% recycling target. The Entity has a material balance statistics table, which aims to minimise the production of waste materials at the beginning and end of the processing process, as well as the generation of non-conforming Scrap products. The target for the 2023 finished product rate assessment is 98.5%, which has been achieved. The waste from trimming a very small amount of Aluminium coil is mainly sold to Aluminium coil production units with melting and casting capabilities for recycling. The Entity manages a shipping list for the waste materials sold back to their supplier, including the alloy model and weight.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Aluminium plates currently produced by the Entity are predominantly 3 series and 8 series, with slight losses. The Aluminium coil has no waste. The temporary waste storage points are divided into 3 series and 8 series, and the waste model is marked on the Aluminium material at the centralised waste storage point for classified sales and utilisation.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity's products are mainly transformed and sold abroad as bottle caps, which are usually sorted or disposed of as general waste. As a result, the Entity does not collect or recycle these products at end-of-life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The product is disposed of by the end consumer and is currently mainly sold by foreign enterprises. After being classified and disposed of by consumers according to local regulations, it enters the waste disposal enterprise. The Entity is currently unable to affect foreign users. Both Aluminium material suppliers are using Recycled Aluminium, and the Entity prefers their suppliers to use Recycled Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity uses both natural gas and electricity at the Gongyi production Facility, whilst the Zhengzhou sales office uses only electricity. The electricity consumption of the Zhengzhou sales office accounts for less than 3% of the overall energy consumption of the Entity. The 2024 Entity Emission Targets and Plan is available at: http://cn.zzgdalu.com/upload/file/20240711/20240711123816001600.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has established a GHG 2023 emissions reduction target at 3%, consistent with the previous year. The Entity plans to reduce emissions by installing rooftop solar energy in the new factory. Some equipment has been equipped with frequency converters to reduce energy consumption. The original plan to repair the air compressor however is still being reviewed and has not been implemented. The Entity's actual data for reducing GHG emissions was at 1.2% per unit of production in 2023, as a result, they did not achieve the emission reduction target, of 3%.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity assesses its atmospheric emissions annually, with the most recent assessment being undertaken in February 2024. The emission source is natural gas combustion in the report confirms that exhaust gas detection emissions are in conformance. Compared with the 2023 test report, the concentration of nitrogen oxides in exhaust gas has significantly decreased, with the overall average of emissions decreasing. The concentration of particulate matter has slightly increased. The consumption of natural gas in 2023 has also significantly decreased compared to 2022.
6.2 Discharges to Water	Conformance	The production processes at the Entity's facilities do not involve the discharge of industrial wastewater, but rather the discharge of domestic wastewater. Industrial wastewater is recycled, and domestic sewage is discharged into the sewer system factory and then into the septic tank.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has established the Emergency Preparedness and Response Control Procedure, which requires the establishment of emergency plans for environmental, safety, and other emergencies, as well as the preparation of emergency facilities. The Entity regularly inspects emergency response facilities. The emergency response procedure flow specifies the disposal process after the event occurs. The Entity provided the 2023 Leakage Risk Identification and Evaluation Report. No Leakage incidents occurred in 2023.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established an Emergency Plan for Sudden Environmental Incidents and an Emergency Plan for Chemical Leakage. The workshop is equipped with emergency supplies such as fire extinguishers, protective clothing, first aid kits, disinfectant masks and firefighting sand. The Emergency Response Plan is available at: http://cn.zzgdalu.com/upload/file/20240913/20240913144872817281.pdf

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has emergency plans for sudden environmental or safety incidents. Since the last Audit, there have been no leaks and a statement confirming there were no Leakage incidents has been made public and is available at: http://cn.zzgdalu.com/newsx/24.html
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has disclosed that there have been no Spills or Leakage incidents, available at: http://cn.zzgdalu.com/newsx/4.html Since the last Audit, there have been no leaks and a statement confirming there were no Leakage incidents has been made public, available at: http://cn.zzgdalu.com/newsx/24.html
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed waste disposal management measures combining the prevention and control of waste, promoting clean production, and developing circularity principles. During the collection, storage, transportation, utilisation, and disposal of waste, Leakages are prevented, and the waste is not disposed of arbitrarily. The disposal of Hazardous Waste is contracted out to a qualified company, and a Hazardous Waste transfer form is provided. The latest transfer was undertaken in March 2024. The Entity sells Scrap Aluminium to Scrap Aluminium recycling companies or suppliers for recycling and reuse.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the amount of solid waste generated for 2023 including sludge, waste Aluminium disposal, Hazardous Waste disposal, waste packaging materials and is available at: http://cn.zzgdalu.com/upload/file/20240712/20240712110929002900.pdf
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 (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 Zhengzhou sales offices use municipal water with overall low water consumption. The Gongyi production Facility's water source is provided by the landlord for general consumption, hygiene and production purposes. The production water is recycled and replenished after evaporation. According to the 2023 Water Use Inventory, the total daily water consumption is approximately four metric tonnes. A small portion is for domestic use, while the majority is for replenishment of circulating water. A water usage plan has been developed to maintain or marginally reduce current water usage level.
7.1b Water assessment (risk assessment)	Conformance	The Entity has developed a Water Resource Risk Assessment Report for the Gongyi production Facility, which evaluated the low impact of a small amount of groundwater extraction in Gongyi City and the overall risk level is considered as low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity, as its water consumption is low, and the risk assessment is low.

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7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity, as its water consumption is low, and the risk assessment is low.
7.3 Disclosure of water usage and risks	Conformance	The Entity has established a Water Use Plan. In 2023, the Gongyi production Facility used 1,148 metric tonnes of industrial recycled water and 228T metric tonnes of domestic water, slightly lower than the planned water consumption. A water usage target has been set for 2024, reducing water usage by approximately 3.7% compared to 2023. http://cn.zzgdalu.com/upload/file/20240711/20240711122665436543.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has analysed the surrounding environment and provided a Biodiversity Assessment Report, analysing the flora and fauna resources throughout the Gongyi County. There are no key protected flora and fauna features identified within 500 metres of the Entity. The Entity's assessment shows that the impact on the surrounding Biodiversity is low. The land area occupied by the Gongyi factory is relatively small. The Entity is located east is a small forest, the south is a railway, the west is a river, and across the river is a residential area under construction, which is over 100 meters long.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, the Biodiversity Assessment shows that the impact on the surrounding Biodiversity is low. However, the Entity conducts annual environmental emissions testing, and The result meets the standards. The 2024 environmental testing report includes exhaust gas and noise results, which meet the requirements. The Entity provided Hazardous Waste transfer records and transferred them to Hazardous Waste treatment enterprises as required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, the Biodiversity Assessment confirms that the impact on the surrounding Biodiversity is low.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, the Biodiversity Assessment confirms that the impact on the surrounding Biodiversity is low. However, the Biodiversity Assessment Report formulated by the Entity has been made public on the website at:

CRITERION	RATING	COMMENT
		http://cn.zzgdalu.com/upload/file/20240711/20240711123334793479.pdf
8.3 Alien Species	Conformance	The Entity has control measures in place of foreign organisms, and fumigation is required for wooden pallets from overseas. At present, the pallets used are domestically produced and no foreign pallets are used.
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 mines)	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 established a Human Rights Policy, which commits to complying with international Human Rights declarations and Conventions and fulfil important social responsibilities.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established the Human Rights Investigation and Control Procedure, which defines the principles and understanding of Human Rights, avoids promoting adverse Human Rights impacts through the activities, and manages those with any adverse impacts. The Entity has prepared a Human Rights Due Diligence Report, and the Report concludes that the Entity does not engage in any Human Rights violations.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted Human Rights Due Diligence and found no adverse effects on Human Rights. However, it has established a Child Labour Remediation Plan and a Human Rights Investigation and Control Procedure to address any potential adverse impacts on Human Rights.
9.2 Women’s Rights	Conformance	The Entity has established a Labor Protection Policy for Female Workers which stipulates the protection of women's legitimate rights and interests. The Entity’s Risk Control Procedure for Newborn Mothers and Pregnant Women refers to

CRITERION	RATING	COMMENT
		the protection of their rights. More than half of the Entity's employees are female. Interviews were conducted with female employees at Gongyi production Facility, and it was found that there have been no incidents or violations.
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 are no cultural or sacred heritage sites within two kilometres of both the Zhengzhou sales office and Gongyi production Facility. The nearest religious site to Gongyi is a Shaolin Temple located approximately 40 kilometres away. The Entity's activities have no impact on any surrounding religious or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>This Criterion is not applicable to the Entity, as no resettlements have occurred or planned as a result of their operations.</p> <p>The Entity has purchased industrial land in the industrial zone and is building a new factory. The purchased land was obtained by the local government in accordance with regulations and publicly listed for sale. The local town government unified the planning and provided compensation plans to local farmers for the original landowners. The new factory is located in the same county. With respect to the old factory, the Entity intends to continue to lease this facility and existing Workers will therefore not be affected.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>This Criterion is not applicable to the Entity, as no resettlements have occurred or planned as a result of their operations.</p> <p>The new factory area has been acquired by the government for several years and an agreement has been signed between the government and local farmers to purchase farmland and sell it, excluding residential areas. Local farmers mainly rely on working in factories as their main livelihood, and land acquisition has had little impact on their livelihood.</p>

CRITERION	RATING	COMMENT
9.7a Local Communities (rights and interests)	Conformance	There are no residential areas adjacent to the Gongyi production Facility. Ongoing construction of housing to the west of the site is almost completed, however presently remains vacant. Employees hired by the Entity are mainly locals..
9.7b Local Communities (impacts)	Conformance	The Entity uses little land and there is no adverse impact on the local community. The resettlement housing community established across the river to the west, with a distance of over 100 metres, is expected to have no substantial impact.
9.7c Local Communities (livelihoods)	Conformance	The employees mainly come from neighbouring communities. The factory is small in scale and has not yet had any in-depth interaction with communities as there are relatively little or no impacts by the Entity.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The main raw material Aluminium coils purchased by the Entity originate from factories in the same province. Most of the Aluminium used in these factories comes from Recycled Aluminium. The supplier has signed a commitment letter not to purchase raw materials from conflict affected areas. The Entity has established the Management Regulations for Investigating Conflict Minerals and does not purchase raw materials from Conflict-Affected or High-Risk Areas (CAHRA).
9.9 Security practice	Conformance	The Gongyi production Facility does not employ security guards, and during the transportation of goods they are registered by dispatchers. The rented factory has dedicated security guards who only assist in registering Visitors at the entrance and employees are not affected. There is no security guard in the Zhengzhou sales office, and the security guard in the office building is only responsible for access safety control.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable, as the Entity adheres to Applicable Law in China regarding Freedom of Association and Right to Collective Bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has implemented a Freedom Association and Collective Bargaining Control Procedure, which stipulates that employees are free to join Unions or engage in Collective Bargaining. There has been no Collective Bargaining activity yet. Workers who

CRITERION	RATING	COMMENT
		have suggestions will typically report them directly to their supervisor.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has a total of 30 employees at both sites. There is a safety representative however no Union. The Entity has committed as required by the documentation, to be willing and supportive of the formation of a Union should the Workers request one.
10.2a Child Labour (minimum age)	Conformance	The Entity has established a Control Procedure for Prohibiting the Use of Child Labour, which prohibits the use of employees under the age of 16 in accordance with Chinese regulations.
10.2b Child Labour (hazardous)	Conformance	Currently, the youngest employee at the Entity is 28 years old. If Child Labour under the age of 16 is identified, remedial procedures must be initiated. The Entity has also developed a Remedial Procedure for Child Labour.
10.2c Child Labour (worst forms)	Conformance	On-site observations and a review of employee registration information did not reveal any use of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, prohibiting direct or indirect support for Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, and prohibiting the request of any form of deposit, recruitment fee, or equipment from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, and prohibiting Migrant Workers to provide deposits and security deposits at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour and prohibiting imposing Debt Bondage or forcing Workers to work to repay debts.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour and prohibiting unreasonable restrictions on Workers' freedom of movement in the workplace or on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour and prohibiting the

CRITERION	RATING	COMMENT
		retention of the original employee ID card, work permit, travel document or training certificate.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, and prohibiting depriving Workers of the freedom to report and terminate their employment at any time within a reasonable time, and without the fear of punishment.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Control Procedure, which prohibits Discrimination in matters such as employee recruitment, compensation, training, promotion, and dismissal. The procedure requires gender equality, and equal pay for equal work. In employee interviews, no apparent incidents of Discrimination were found.
10.5 Communication and engagement	Conformance	<p>The Entity has established a Communication Management Control Procedure, which specifies internal and external communication channels. The Entity makes announcements to departments and employees through WeChat and in other forms. Employees can provide feedback to management through email, WeChat, face-to-face communication, and meetings.</p> <p>There is a suggestion box positioned at the entrance of the workshop where employees can provide feedback however, no suggestions were received in 2023.</p> <p>The Workshop Manager collects feedback from employees and the Gongyi production Facility has summarised and processed the feedback from the employees.</p>
10.6 Disciplinary practices	Conformance	There are reward and disciplinary measures provided by the Entity. These disciplinary measures are divided into verbal warning and dismissal, and no personnel have been dismissed in the past year. Verbal warnings occur without any economic penalties. Interviewed employees' there have been verbal feedback on quality production issues, but no economic penalties, physical punishment, or verbal abuse have been imposed.
10.7a Remuneration (living wage)	Minor Non-Conformance	The Entity identified that the minimum wage for the Zhengzhou sales office and Gongyi production Facility in 2024 is 2,100 yuan per month. A review of salaries for April to June, all meet the minimum wage requirements.

CRITERION	RATING	COMMENT
		However, it was identified some employees of the Entity worked Overtime in April, but the Entity's payroll did not include Overtime pay information despite changes in income. The personnel of the Zhengzhou sales office have social security payment records and the Gongyi factory just completed the social security procedures for its employees in July and payment is currently in process.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments at the end of each month via bank transfer.
10.8 Working Time	Minor Non-Conformance	<p>According to the working hours regulations provided by the Entity, the Zhengzhou sales office operates on an 8-hour schedule from Monday to Friday. Attendance records were sampled for March and May, and only one or two management personnel work on Saturdays. The Gongyi production Facility is divided into day and shift Workers, with a regular shift being 8 hours and 5 days. Shift work consists of two shifts, 8:00-16:00 and 16:00-24:00.</p> <p>A random check of the attendance records was undertaken as part of the Audit of the Zhengzhou sales office and the Gongyi production Facility from April to June. For April, the attendance sheet showed a total of 30 people, with seven Workers working eight hours a day but without rest that month. Others worked 8 hours per shift and had at least one day off per week.</p> <p>The interviews revealed there are no corresponding regulations for paid annual leave for employees.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed and implemented an ISO 45001 certified Management System and an Occupational Health and Safety (OH&S) Policy. The Entity reviews the Policy annually which has been approved and supported by the General Manager. The Entity developed Health and Safety objectives and regularly reviews the achievement of the objectives.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an ASI Policy, which includes the OH&S Policy, and which is shared on the bulletin board at the factory and the publicity board at the Sales Office.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established a Health and Safety Policy, which includes safety first, individual responsibility and prevention orientation objectives. The Entity has established an ASI Manual to follow the Health and Safety Policy and to comply with ILO Conventions 155 and 176.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has stated in the ASI Manual that employees should be aware of the hazards and safety measures of their work and can refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System which includes manuals, procedures and various job instructions. The documents require the Entity to identify applicable regulations and comply with corresponding regulatory requirements. The Entity has a Health and Safety affairs representative who attends regular management meetings.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a Health and Safety Committee with the workshop supervisor acting as the safety affairs representative. The safety committee requires Workers to participate in Health and Safety reviews of the EHS manual.
11.4 OH&S performance	Conformance	The Entity measures and monitors the status of achievement of health and safety target indicators, including no fire, no mechanical injury which are calculated monthly. Current statistics confirm that targets have been achieved

Document Control and Version History

Revision	Date	Notes
0	24 Jan. 2024	Initial Certification Audit - Provisional Certification
1	18 December 2024	Surveillance Audit – Full Certification