

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Jiangsu Synprim Metal Materials Technology Co., Ltd

CERTIFICATE NUMBER

400

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL

PROVISIONAL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

CHINA QUALITY  
MARK CERT. GROUP

DATE OF ISSUE

21 JANUARY 2025

DATE OF EXPIRY

20 JANUARY 2026

CERTIFIED SINCE

21 JANUARY 2025

AUTHORISED BY

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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](http://www.Aluminium-stewardship.org)

CERTIFICATION SCOPE

Aluminium cutting processes,  
packaging and sales management  
activities at Jiangsu Synprim Metal  
Materials Technology Co., Ltd,  
located in Jiangsu, China.

\* Provisional Certification is valid  
for the period of one year, during  
which the company can address  
the non-conformances assessed  
and subsequently seek full  
certification.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Jiangsu Synprim Metal Materials Technology Co., Ltd
ENTITY NAME	Jiangsu Synprim Metal Materials Technology Co., Ltd
CERTIFICATION SCOPE	Aluminium cutting processes, packaging and sales management activities at Jiangsu Synprim Metal Materials Technology Co., Ltd, located in Jiangsu, China.
SUPPLY CHAIN ACTIVITIES	Material Conversion
ASI STANDARD	Performance Standard V3
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	29 – 30 August 2024
AUDIT REPORT SUBMISSION	23 September 2024
AUDIT SCOPE	<p>The Aluminium cutting processes, packaging and sales management activities at Jiangsu Synprim Metal Materials Technology Co., Ltd, located at No.88 Zhonghua Road, Kunshan City, Jiangsu Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Provisional Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	21 January 2025 – 20 January 2026
NEXT AUDIT TYPE	Surveillance Audit

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NEXT AUDIT DATE 20 July 2025

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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.

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## ENTITY OVERVIEW

The Entity, Jiangsu Synprim Metal Materials Technology Co., Ltd. (the 'Entity'), is located at No.88 Zhonghua Road, Chengbei, Kunshan City (Kunshan Airport Industry Supporting Base), Jiangsu Province, China. It began operations in 2021 and has 34 employees, nine of which are women. Its core business principle is "cooperative innovation, advanced quality, sustainable development."

Its main supply chain activity is material conversion. The Entity's processes comprise shearing, processing, and selling Aluminium rolls, mostly used in 3C products such as anode Aluminium for 3C consumer electronics, recycled anode Aluminium, low-carbon anode Aluminium, high-strength anode Aluminium, and ultra-light metal materials. The Entity supplies materials to the supply chain of terminal brands such as HP, Lenovo, Dell, Asus, Acer, Huawei and Honor. Jiangsu Xinpurui is the strategic partner of China Aluminium's high-end Manufacturing Company. In 2023, the sales of its 'low-carbon' Recycled Aluminium offerings were about 4,500 tons and the primary destination of their products is mainly China and Vietnam. The raw material supplier is Chinalco Ruimin Co., LTD. is an ASI member.

The Entity's production area is about 4000 square meters, the office space is 400 square meters. The facility includes administrative offices, warehouses, workshops and testing rooms.

## 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
<b>SYSTEMS</b>	Medium	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented processes to ensure and monitor Legal Compliance, Applicable Laws and requirements.
1.2 Anti-Corruption	Conformance	The Entity has formulated an 'Anti-Corruption and Bribery Control Procedure' that encompasses Anti-Bribery requirements and ensures its effectiveness.
1.3a-e Code of Conduct	Conformance	The Entity has adopted a Code of Conduct / Code of Business Ethics, which is available at: <a href="https://img01.71360.com/w3/o5z3ww/20240709/195865be85382adddd7ed41c8abed3b9.pdf">https://img01.71360.com/w3/o5z3ww/20240709/195865be85382adddd7ed41c8abed3b9.pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed an Integrated Policy covering Environmental Protection, Social Responsibility, Behaviour, and Quality Management. The Policy is reviewed as part of the Entity's annual Management Review. <a href="https://img01.71360.com/w3/o5z3ww/20240702/eec0386520b9dddde940e41884adfc3c8.pdf">https://img01.71360.com/w3/o5z3ww/20240702/eec0386520b9dddde940e41884adfc3c8.pdf</a>
2.2a-c Leadership	Conformance	The Entity has established a team for ASI implementation and identified all responsible persons for the different clauses of the ASI Performance Standard. The Entity also designates a Management Representative responsible for ASI standards implementation, compliance, and communication.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and Certified an Integrated Management System covering Quality, Environmental and Occupational Health and Safety.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented a Social Management system following the SA8000 requirements (currently not certified).
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has developed and implemented a Business Code of Conduct for Suppliers that addresses Environmental, Social, and Governance issues. The Code, which the suppliers must sign along with the General Purchasing Terms and Conditions, is essential to daily business. However, the latest Responsible Purchasing Policy has not been publicly disclosed, and there is no requirement to review it at least once every five years.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity since it has no New Projects or substantial changes to its current Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity since it has no New Projects or substantial changes to its current Facilities.

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan with the Community's involvement. The effectiveness of the Emergency Response Plan is checked and trained regularly.
2.8a-d Suspended Operations	Conformance	The Entity holds an environmental permit, which includes the mandatory procedure for a potential site closure or suspension of operations.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has formulated a 'Merger and Acquisition Procedure' considering Environmental, Social, and Governance factors when executing a Merger or Acquisition.
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	The Entity holds an environmental permit, which includes the mandatory procedure for a potential site closure or in case of operation suspension. The land used by the Entity is a leased campus. However, the Entity does not have a plan to address the environmental and social issues arising from Closure, Decommissioning, and Divestment.
<b>3. Transparency</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance practices along with its Annual Sustainability Reports via the following link: <a href="https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf">https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf</a>
3.2 Non-Compliance and Liabilities	Conformance	The Entity has stated in its Sustainability Report that there were no Non-Compliances with relevant environmental legislation in 2023: <a href="https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf">https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity has defined approval processes that control its payments. The Sustainability Report publicly discloses a statement from the Finance Department. <a href="https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf">https://img01.71360.com/w3/o5z3ww/20240829/b6e9b2712574dba079e53252a846503d.pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a procedure for registering and managing Stakeholder complaints, grievances and requests for information. The Complaints Resolution Mechanism can be accessed via a hotline at 18013621684 and by email ( <a href="mailto:parker@synprim.com">parker@synprim.com</a> ).
<b>4. Material Stewardship</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity completed Life Cycle Assessments (LCA). However, the LCA report does not comply with relevant ISO guidelines, and the LCA data is lacking, particularly in the absence of carbon footprint data and other environmental impact data. The data is not cradle-to-gate, and there is no data on purchased raw materials. The company's energy consumption data is not based on actual measurements but appears to be estimated totals without allocation per ton of product.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	The results of the latest LCA Report are available at <a href="https://img01.71360.com/w3/o5z3ww/20240829/653554e470a3eb2a246a4adf93c33624.pdf">https://img01.71360.com/w3/o5z3ww/20240829/653554e470a3eb2a246a4adf93c33624.pdf</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as it customises Aluminium sheets according to the customer's specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects and recycles all Scrap, Process Scrap is targeted throughout the whole process chain. The Entity has implemented objectives, plans, and projects to reduce process Scrap further over time.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Minor Non-Conformance	The physical production process is relatively simple, and a supplier recycles 100% of the waste generated. However, the Entity does not have an effective recycling strategy for end-of-life products. For more information, please see: <a href="https://img01.71360.com/w3/o5z3ww/20240830/92b11554262b024b635599cda58837ff.pdf">https://img01.71360.com/w3/o5z3ww/20240830/92b11554262b024b635599cda58837ff.pdf</a>
4.4d Collection and Recycling of Products at End of Life	Minor Non-Conformance	The Entity has delineated pertinent product recovery and recycling requirements in its 'Performance Assurance Manual' and formulated a comprehensive recovery strategy. However, there is insufficient evidence to demonstrate what actions the Entity has taken to support and promote the development of the societal Aluminium recycling system and improve recycling rates.
<b>5. GHG Emissions</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has compiled its Greenhouse Gas (GHG) Emissions targets and implemented plans, including the target and path to reduce Emissions. However, the Entity has not publicly disclosed Raw Materials and Energy Use.
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	Major Non-Conformance	<p>The Entity's 'Management Manual' stipulates that it shall carry out annual verification activities on GHG emissions and publicly disclose Material GHG emissions and energy use information, which is disclosed annually on the Entity's website (<a href="http://www.synprim.com">www.synprim.com</a>) in the form of GHG Emissions Report, GHG Emissions Target and Implementation Plan.</p> <p>The Entity's 2023 GHG emissions are aligned with its GHG Reduction Plan requirements. However, the Entity did not use the ASI GHG Pathway Calculation Tool to calculate its emission deductions, has not disclosed information on Scopes 1, 2 and 3 Emissions, and has not</p>

CRITERION	RATING	COMMENT
		<p>demonstrated intermediate to long-term targets on its Emissions Reduction Plan.</p> <p>However, the content expressed in the above report is only limited to the total emissions reduction target and the year's situation. The Entity fails to provide specific Emission Reduction Plans that meet the requirements of the 1.5C warming scenario. There is no scientific methodology, no specific mathematical path to achieve this goal, no medium-term goal of no more than five years, and no public disclosure of how this goal will be achieved.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity has established an 'Environmental and Occupational Health and Safety Operations Control Procedure' and an Environmental Monitoring and Measurement Control Procedure. These procedures are designed to manage the GHG Emissions Reduction Plan and assess whether the actual performance in emissions reduction has met established targets. However, this Management System is underdeveloped, with significant gaps in knowledge and capabilities, a lack of concrete actions, no noticeable results, and emission reduction targets that do not meet the requirements.
<b>6. Emissions, Effluents and Waste</b>		
6.1a-f Emissions to Air	Conformance	The Entity's product/process is the slitting and shearing processing of Aluminium, which is relatively simple and produces no Material exhaust emissions.
6.2a-g Discharges to Water	Conformance	The Entity's product/process is the slitting and shearing processing of Aluminium with no Material production wastewater generated. Domestic sewage is indirectly discharged to municipal sewage treatment plants.
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	The Entity evaluates its air, water, and land pollution risks during a possible Leakage in the production process and identifies possible emergencies of Leakage. It has developed an 'Emergency Preparedness and Response Control Procedure' and conducts annual drills related to Leakage and Leakage risks. However, the Entity has not disclosed the management plan for Spills and Leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The 'ASI Management Manual' stipulates that when leaks occur, the amount, type, and potential impact are immediately disclosed to the affected parties. No Leakages have occurred at the Entity.
6.5a-c Waste Management and Reporting	Conformance	The Entity's Certified product/process is the slitting and shearing processing of Aluminium. No Hazardous Waste is generated, and the general solid Waste (Aluminium Scraps) is recycled.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
<b>7. Water Stewardship</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The Entity's Water Risk Assessment is deemed as low. However, the Entity hasn't disclosed its risk assessment.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the result of the Water Risk Assessment has assessed and documented water-related risks as low.
<b>8. Biodiversity and Ecosystem Services</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located in an industrial zone designated by the local government, away from Protected Areas. It has conducted a Biodiversity Impact Assessment, and the risks and impacts on Biodiversity and Ecosystem Services are considered low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the risks to Biodiversity and Ecosystem Services are considered to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified in the Biodiversity Impact Assessment are assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no Priority Ecosystem Services within the Entity's Area of Influence.
8.4 Alien Species	Conformance	The Entity assesses its risks and implements controls to prevent the accidental introduction of Alien Species that could significantly negatively impact Biodiversity.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is not located near World Heritage Properties and has committed not to explore or build New Projects on or near World Heritage sites.
8.6a-d Protected Areas	Conformance	The Entity is in an industrial park away from Protected Areas.
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.
<b>9. Human Rights</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented a comprehensive Human Rights Policy detailed in its Social Management Policy. Additionally, the Entity has established a 'Human Rights Due Diligence Procedure' that defines the methods for identifying, preventing, mitigating, and addressing actual and potential impacts on Human Rights. It assesses current and prospective Human Rights impacts annually, culminating in a Human Rights Due Diligence Report. The Human Rights Policy undergoes

CRITERION	RATING	COMMENT
		<p>review whenever indicators of control deficiencies are detected. The Policy is publicly available at:</p> <p>The Entity has conducted a Human Rights Impact Assessment and the Human Rights Impact Assessment Report for Code of Conduct, which has been communicated and disclosed at:  <a href="https://img01.71360.com/w3/o5z3ww/20241010/ecfa38f1035d8cf9d903467590a67a76.pdf">https://img01.71360.com/w3/o5z3ww/20241010/ecfa38f1035d8cf9d903467590a67a76.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a 'Protection and Prevention of Occupational Diseases for Female Employees Procedure' to uphold women's rights and interests. This procedure aims to eliminate Discrimination against women and safeguard their equal rights, including health rights, equal access to training, decision-making roles within the Entity, equitable compensation, protection from sexual Harassment, and equal competitive opportunities.</p> <p>The Entity is committed to ensuring that women's legal rights and interests are upheld by implementing control measures to guarantee their fulfilment. Additionally, the Entity reviews its gender equality initiatives every five years.</p> <p><a href="https://img01.71360.com/w3/o5z3ww/20241010/48bd881c012018ce4d7f9554fcd53dea.pdf">https://img01.71360.com/w3/o5z3ww/20241010/48bd881c012018ce4d7f9554fcd53dea.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as no Indigenous Peoples are within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	The Entity has refrained from initiating new expansion or renovation projects. Should such projects be undertaken in the future, they will be executed in accordance with International Standards and the Entity's Indigenous Protection Procedure.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity as no Indigenous Peoples are within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable as there is no Cultural and Sacred Heritage within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as no Indigenous Peoples are within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it is located within an industrial zone and has not caused any displacements.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	The Entity has established an 'Influence on Stakeholders Procedure', which respects the legal and traditional rights of Local Communities, customers, suppliers, administrative agencies, and other Stakeholders regarding their land, livelihoods, and utilising natural resources. However, the Entity does not plan for potential and adverse impacts on the livelihoods of Local Communities.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Responsible Sourcing Policy, pledging not to source materials from Conflict-Affected and High-Risk Areas (CAHRAs). It has a Due Diligence process to assess business and Human Rights violations risk.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity conducts annual supply chain Due Diligence through assessments in CAHRAs to ensure that neither its business operations nor direct raw material suppliers are present. The Due Diligence Report did not list or identify any significant risks related to CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the Due Diligence processes did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has conducted a supply chain Due Diligence, and no significant risks were identified in the Due Diligence Report involving CAHRAs. However, it does report on CAHRAs: <a href="https://img01.71360.com/w3/o5z3ww/20240830/de709b7fbc6abc51dcdefdc53849673.pdf">https://img01.71360.com/w3/o5z3ww/20240830/de709b7fbc6abc51dcdefdc53849673.pdf</a>
9.9 Security practice	Conformance	The Entity only employs unarmed guards. The Entity has established and implemented a 'Security Operations Procedure' that outlines the management responsibilities of security personnel and provides comprehensive training to ensure that all security personnel are well informed of their duties and respect Human Rights in their roles.  To date, no complaints or allegations relating to security matters have been reported. Observations confirmed that the private security provider respects Human Rights in accordance with recognised standards and good practice. No body searches are performed.
<b>10. Labour Rights</b>		
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 (e.g. Freedom of Association is not absolutely free in China).
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity guarantees the right of all individuals to freely establish, join, and organise unions and to engage in Collective Bargaining on behalf of themselves and the company. The Entity's employees have not formed a trade union or any other collective organisation.
10.2a Child Labour	Conformance	The Entity does neither use nor support Child Labour. It has established and implemented the 'Mitigation of Child Labour and Protection of Adolescent Workers Procedure,' which strictly prohibits the employment of child labourers. The minimum working age of 18 is respected, and the youngest Worker was 21 at the time of the Audit.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	<p>The Entity does not engage in or support the use of Forced Labour. The Entity has implemented a 'Prohibition on Forced Labor Management Procedure' against Forced Labour, rejects Human Trafficking, and does not demand any form of deposit or down payment from recruited employees. The Entity ensures Workers have unrestricted freedom of movement within the workplace.</p> <p>The Modern Slavery Statement is available at:  <a href="https://img01.71360.com/w3/o5z3ww/20241010/52b44e631dafd7a22a6f79f70394f3fb.pdf">https://img01.71360.com/w3/o5z3ww/20241010/52b44e631dafd7a22a6f79f70394f3fb.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has implemented a 'Preventing Discrimination Procedure' alongside a monitoring mechanism. It ensures that the principle of Non-Discrimination is upheld across all Businesses. A performance evaluation system has been instituted to fairly and impartially assess employee performance based solely on merit, without Discrimination related to age, gender, or job classification. The Entity also provides training and accessible channels for complaints to foster a culture of non-discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established a 'Consultation, Communication, and Information Exchange Management Procedure'. Regular meetings with Workers and their representatives are organised and documented. Workers can ask questions or raise ideas via various channels, either by reporting them to the human resources team, other relevant managers or their representatives. The Entity has developed various channels (e.g., online or in person) to respect the Workers' diversity and communication needs.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented the "Management Procedure for Punitive Measures," which strictly prohibits any form of physical punishment, mental or physical coercion, Harassment, and gender-based Violence, including sexual Harassment and verbal abuse.</p> <p>The Entity has disclosed a statement against Violence and Harassment in its Code of Conduct for Labor Rights, available at:  <a href="http://www.synprim.com">www.synprim.com</a></p>
10.7a-d Remuneration	Conformance	<p>The Entity has developed a transparent Remuneration process. Workers are paid in full, and additional benefits are paid in addition to their basic wages, as confirmed by a review of randomly selected Worker Remuneration records. Payment for Overtime and social security was provided.</p>
10.8a-c Working Time	Conformance	<p>The Entity adheres to all relevant laws and industry standards concerning working hours and public holidays. The standard workweek (excluding Overtime) shall not exceed 40 hours. National statutory holidays, paid annual leave, and other entitlements are fully implemented in compliance with the Labor Law of the People's Republic of China. Working hours and compensation for relevant personnel align with Applicable Laws and regulations. Employees are entitled to at least two days off after five consecutive workdays. Overtime is voluntary, with a maximum allowable weekly Overtime limit is 12 hours.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their rights through formal documentation and ensure their protection. Additionally, employees can acquire information regarding their rights and obligations</p>

CRITERION	RATING	COMMENT
		through various channels, including written correspondence, telephone and in-person meetings.
<b>11. Occupational Health and Safety</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety Management (OH&S) System and is ISO45001 Certified. To effectively manage its OH&S, the Entity has developed a 'Quality, Environment, and Occupational Health and Safety Management Manual'. The system is audited annually and reviewed every three years.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity has established a 'Quality, Environment, Occupational Health and Safety Management Manual' to ensure effective OH&S management. OH&S audits are conducted annually, and the OH&S Management System is reviewed every three years. However, the Entity does not publicly disclose the effectiveness of the OH&S management system and comparative analyses with peer businesses and leading practice annually.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a 'Quality, Environment, Occupational Health and Safety Management Manual' to ensure effective OH&S management. An OH&S committee, chosen by Workers, has been established to formulate Policies and resolve issues related to OH&S.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	Xx January 2025	Initial Certification Audit – Provisional Certification