

ASI CERTIFICATION PERFORMANCE STANDARD

PRESENTED TO

Kunshan Chaogun Metal Products Co., Ltd

CERTIFICATE NUMBER
399

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
SHANGHAI KYLIN
CERTIFICATION SERVICE
CO., LTD.

DATE OF ISSUE
28 FEBRUARY 2025

DATE OF EXPIRY
27 FEBRUARY 2026

CERTIFIED SINCE
28 FEBRUARY 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*

CERTIFICATION SCOPE

Production of Aluminium alloy
ingots and bars, with the processes
of melting, refining, ingot die
casting, casting bar casting,
homogenisation and cutting, at the
facility in Zhangpu Town, Kunshan
City, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kunshan Chaoqun Metal Products Co., Ltd
ENTITY NAME	Kunshan Chaoqun Metal Products Co., Ltd
CERTIFICATION SCOPE	Production of Aluminium alloy ingots and bars, with the processes of melting, refining, ingot die casting, casting bar casting, homogenisation and cutting, at the facility in Zhangpu Town, Kunshan City, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">17 – 18 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">29 September 2024
AUDIT SCOPE	<p>The Audit Scope includes the production of Aluminium alloy ingots and bars at the facility in Zhangpu Town, Kunshan City, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional 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	28 February 2025 – 27 February 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 27 August 2025

CERTIFICATE NUMBER 399



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ENTITY OVERVIEW

Kunshan Chaoqun Metal Products Co., Ltd. (the 'Entity') was established in June 2009 and is located in Zhangpu Town, Kunshan, Zhejiang, China. The Entity specialises in producing 1 series to 7 series deformed Aluminium alloy bars and various standard and special grades of Aluminium alloy ingots. The main processes include melting, refining, Aluminium ingot casting, Aluminium bar casting, homogenisation and cutting. The Entity has an annual production capacity of 80,000 tonnes of casting bars, 40,000 tonnes of Aluminium alloy ingots and 10,000 tonnes of liquid Aluminium alloys.

The Entity covers a construction area of 9,000 square meters (m²), with additional spaces for raw material storage (1,500 m²), finished products (1,800 m²), and waste management. It primarily serves the domestic electronics and automotive industries and works closely with key local Stakeholders, including the Kunshan Environmental Protection Bureau and other municipal agencies. The Entity is within an industrial area with no nearby residential communities. There are over 115 employees at the Entity.

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	Low	Low	Low	LOW
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a Legal, Regulatory, and Other Requirements Management Procedure to guide the collection, acquisition, and application of relevant regulations. It maintains a Compliance Evaluation Record for Laws and Regulations, covering areas such as Environmental, Health and Safety (EHS), women's rights, energy, labour insurance, traffic safety, taxation, anti-Bribery and anti-competition laws. The latest assessment confirmed the Entity complies with Applicable Law.</p> <p>However, the Entity's pollution discharge permit does not cover all the buildings the Entity owns or leases. Additionally, the fire safety assessment did not include all the Entity's buildings.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity has implemented an Anti-Corruption Policy and an Anti-Corruption and Anti-Bribery Procedure to address Bribery and Corruption. Key roles, such as sales and purchasing, are provided with training and are required to sign Anti-Corruption Agreements. Management, including sales, procurement, and quality control, have signed the Anti-Bribery Commitment Letter, which is reviewed by the General Manager. Anti-Corruption training has been conducted for all staff and records are maintained. The Anti-Bribery Policy includes a complaints hotline on the Entity's website, and a suggestion box is available in the cafeteria.</p> <p>The Entity has established a Corruption risk assessment to identify risks in human resources, purchasing, and business operations. However, the assigned Audit Department has not been established, and the assessment is incomplete.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity's ASI Code of Conduct covers anti-Corruption, regulatory Compliance, and public disclosure. The Code requires the management of environmental impacts, reduction and disclosure of Greenhouse Gas (GHG) emissions, and responsible use of water. Social commitments include respecting employee and community rights, avoiding conflicts and Human Rights violations, and complying with regulations.</p> <p>The Code is reviewed every five years and following any defects or major changes: http://www.cqjszp.com/news_detail.aspx?id=84</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has developed various Policies including Environmental, Health and Safety, social responsibility, governance and responsible procurement policies, all approved by the General Manager. The Environmental, Social, and Governance Policy Management Procedure mandates evaluation of the Policies every five years and on changes or control gaps. The Policies are accessible to relevant parties via public announcements on the Entity's website: http://www.cqjszp.com/news_detail.aspx?id=85</p> <p>However, employee interviews revealed a lack of awareness of the Entity's ASI-related Policies.</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Quality Assurance Department Manager has been appointed as the ASI Management Representative by the General Manager. The responsibilities of this role are documented and include establishing and overseeing the ASI system, implementing management processes, communicating internal and external Policies, and ensuring the provision of necessary resources such as manpower, materials, and funding.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System, with a valid certificate covering the production of Aluminium alloy ingots and bars. It has established environmental Policies and goals, which are regularly reviewed for progress and compliance.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an ISO 45001 certified Occupational Health and Safety Management System, valid for the production of Aluminium alloy ingots and bars. Additionally, the Entity has developed the Social Responsibility Management Manual, encompassing procedures for labour rights, working hours, compensation, association, communication, management review, and internal audits.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a Responsible Procurement Policy, which addresses ethical sourcing, anti-Corruption, Human Rights, Stakeholder engagement, environmental protection, and energy conservation. It conducts supplier Due Diligence, suspending those involved in Human Rights violations, Corruption, or conflict zone activities. The Entity's Environmental, Social, and Governance (ESG) Policy Management Procedure stipulates that Policies are reviewed every five years or following Material changes or control gaps. The Responsible Procurement Policies are accessible at: http://www.cqjszp.com/news_detail.aspx?id=85</p> <p>The Entity has obtained ASI commitments from three suppliers (for magnesium, zinc, and manganese chromium), and related social responsibility audit reports. However, other key suppliers have not yet provided a letter of commitment regarding the evaluation of social responsibility.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have taken place since the Entity joined ASI. The Entity has prepared Environmental and Social Impact Assessments previously, in 2016 and 2023, and has established processes to conduct Impact Assessments as required.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have taken place since the Entity joined ASI. The Entity has established processes to conduct Impact Assessments in the future as required.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented the relevant Management System as part of its Health and Safety Emergency Plan, requiring a command centre, contingency plans, and reviews every five years or after Material changes. The Comprehensive Emergency Plan for Sudden Environmental Incidents (October 2021) covers emergency structures, contact details, and response teams for scenarios including leaks, equipment failures, fires, explosions, and pollution, and addresses on-site disposal, post-treatment, training, and drills. The Emergency Plan

CRITERION	RATING	COMMENT
		<p>for Safety Production Accidents (December 2023) includes comprehensive contingency plans, special contingency plans (for special equipment, electric shock, mechanical injury, poisoning, natural disasters, hazardous chemical accidents, public health accidents, dust removal systems, and burn accidents), and addresses on-site disposal, workshop, distribution room, office, restricted space and management requirements.</p> <p>No emergencies have occurred in the past year. Drill plans for 2023 (completed) and 2024 (commencing July) include safety and environmental scenarios such as gas leaks, poisoning, typhoons, fires, and equipment failures.</p> <p>The Environmental Emergency Plan and Safety Emergency Plan are registered with the Environmental Protection and Emergency Bureau, and available at: http://www.cqjszp.com/news_detail.aspx?id=90 http://www.cqjszp.com/news_detail.aspx?id=96</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a procedure for managing suspended operations in response to natural disasters, major accidents, epidemics, or other risks. During a suspension, the Environment, Health and Safety (EHS) Department assesses environmental impacts, the equipment department oversees the data system, and the production department coordinates employee arrangements. Management determines when operations can resume. The procedure mandates a review every five years, upon significant changes, or when control deficiencies are identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has a Merger and Acquisition Procedure that outlines the process for mergers and acquisitions, emphasising the need to address financial, legal, and ESG aspects. The Entity must engage Stakeholders to discuss the substantive impacts of past business operations on affected individuals and organisations. Collaboration with these parties is essential to develop and implement impact mitigation plans, with annual progress updates. In recent years, there have been no mergers or acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has a Company Closure, Retirement, and Divestment Procedure that addresses the requirement to review environment, social and governance practices, and consult with Affected Populations and Organisations, including involving them in developing a plan to monitor substantive and legacy impacts. The Entity has no plans for closure, decommissioning, or divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed a 2023 Sustainable Development Report, which outlines its ESG philosophy and impacts on the economy, environment, and society. The Report addresses government payments, Greenhouse Gas emissions, pollution, resource use, Waste management, Human Rights, employee relations, wages, Health and Safety, training, diversity, conservation efforts, anti-Corruption measures, and public Policies. The Report is available at: http://www.cqjszp.com/news_detail.aspx?id=73

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3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed in its 2023 Sustainable Development Report, compliance section, that it has not faced penalties from government authorities for any illegal activities: http://www.cqjszp.com/news_detail.aspx?id=73
3.3a-c Payments to Governments	Conformance	The Entity's payments to government include income tax, value-added tax, personal income tax, stamp duty, property and land fees, urban construction fees, education surcharges, and environmental protection taxes. Over the past year, aside from standard taxes and fees, no additional expenses were incurred. These costs are disclosed in the Entity's 2023 Sustainable Development Report, available at: http://www.cqjszp.com/news_detail.aspx?id=73
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has developed the Stakeholder Complaint, Appeal, and Information Request Mechanism Procedure, with the Entity's ASI Management Representative as the contact person. The Procedure is reviewed every five years or when significant changes in risks or control gaps occur. It outlines principles of legality, accessibility, fairness, transparency, rights compatibility, and participatory dialogue. The complaint process includes receiving, classifying, investigating, providing feedback, archiving, and reporting. Employees can submit feedback via the on-site mailbox or social media. Additionally, the Entity has undertaken an employee satisfaction survey, which addressed communications, training, the reward system, teamwork and abilities. The Entity's Stakeholder Complaint, Appeal, and Information Request Mechanism is available at: http://www.cqjszp.com/news_detail.aspx?id=92</p> <p>However, the Entity was not able to provide a summary or analysis of employee opinions from the previous year during the Audit. Additionally, whilst the employee survey results were summarised and averaged, no follow-up actions were reported. There has been no announcement on the mechanism.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's Products include Aluminum bars and ingots, and as the Entity's manufacturing processes for Aluminium bars and ingots are similar, a Life Cycle Assessment (LCA) has been conducted based on a tonne of Aluminium ingot.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has provided an analysis based on a tonne of Aluminium ingot from 'cradle-to-gate'. The LCA Report includes data on raw materials, energy, and environmental emissions, but its summary is incorrect. The Entity's LCA Report is available at: http://www.cqjszp.com/news_detail.aspx?id=75</p> <p>However, the LCA does not include a comprehensive analysis of the environmental and health impacts throughout the entire Product lifecycle.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has a goal to minimise Aluminium Process Scrap and targets a 100% Aluminium utilisation rate, with weekly calculation of inputs/outputs. The slag generated in the Casthouse is processed in a rotary kiln for Aluminium extraction, while Aluminium water enters the

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		smelting furnace. The remaining material is cooled, separated from ash and slag, and the Aluminium is recycled. The overall utilisation rate remains above 95%.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has implemented a recycling strategy that aims to establish a recycling network to improve Aluminium recovery rates, reduce energy consumption and emissions, and promote energy conservation and environmental protection. The Entity has signed contracts to recycle the Waste from downstream customers.</p> <p>The Entity's Products are a minimum of 90% recycled content, and the Entity plans to use 100% recycled content in the coming years. The recycled content consists of both Post-Consumer and Pre-Consumer material.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has calculated its Greenhouse Gas (GHG) emissions data for 2023 and reported its Scope 1, 2 and 3 GHG emissions for Plants 2 to 7. The 2023 GHG Inventory Report is available at: http://www.cqjszp.com/news_detail.aspx?id=72</p> <p>A Third Party has verified the Entity's GHG emissions, and a Verification Report was issued, available at: http://www.cqjszp.com/news_detail.aspx?id=83</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan target and Implementation Plan for 2024, aiming to reduce emissions by 119 tCO₂e during the year. Key measures include retrofitting the 45T furnace flame vent, increasing photovoltaic power use, and purchasing hydropower. The Entity's GHG Emissions Reduction Plan is available at: http://www.cqjszp.com/news_detail.aspx?id=86</p> <p>However, the Entity has not disclosed Intermediate Targets as part of its GHG Emissions Reduction Pathway, and the scope of GHG emissions is not fully covered in the Entity's GHG Emissions Reduction Plan.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity has implemented a GHG Management System and established relevant documentation. It plans to evaluate the system and emission reductions through internal audits and management reviews. The internal audit and management review reports assess

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		<p>the emission reductions, along with the specific content of the reduction plans and measures.</p> <p>However, during the Audit, inconsistencies were identified between the Entity's emission reduction plans and measures outlined in the management review report and the disclosed GHG emission targets and implementation plans.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity regularly monitors air pollutants, including fluoride emissions through a Third Party, and test reports confirm emissions are within standard limits. The Environmental Impact Analysis Report confirms the types of air pollutants generated and the Entity has disclosed emissions data in the 2023 Air Pollutants Disclosure Report, available at: http://www.cqjszp.com/news_detail.aspx?id=74</p> <p>However, the Entity has not established air pollution reduction targets or developed measures to implement such plans.</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The main source of operational wastewater is from the cooling crystallisation and homogenisation process, which uses circulating water and does not result in direct discharge. Domestic wastewater is discharged. The Entity conducts annual wastewater discharge monitoring, and test results confirm that pollutant levels are within regulatory limits. Discharges to Water are disclosed in the Entity's 2023 Water Pollutants Disclosure Report, available at: http://www.cqjszp.com/news_detail.aspx?id=74</p> <p>However, the Entity does not have a plan to reduce water pollutants and lacks clear reduction targets.</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has established an Environmental Emergency Plan that includes a Leakage management plan for chemicals, fuel oil, and molten Aluminium. An emergency response team, procedures, and preventive measures are in place, with semi-annual drills and complete documentation.</p> <p>However, the management plan has not been publicly disclosed, and a chemical leak in the scrap bulk warehouse identified during the Audit had not been addressed promptly.</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no Material Spills or Leakages since joining ASI, which was verified through online searches.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has implemented measures to reduce the impact of and generation of Hazardous Waste, and has reported its Waste quantities and disposal methods on its website, available at: http://www.cqjszp.com/news_detail.aspx?id=76</p> <p>However, the Entity's Hazardous Waste Management Plan does not address general solid Waste and lacks an assessment of the environmental and health impacts of both Hazardous and Non-Hazardous Wastes.</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
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	The Entity maximises the recovery of Aluminium Scrap and the remaining Dross is sent to qualified Dross processors. The Entity has established a ledger and publicly disclosed data on its recycling and outsourcing efforts.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>In compliance with local laws and regulations, the Entity prohibits groundwater use and sources potable water from the local water company. The Entity has assessed its water-related risks based on probability, hazard severity, and overall risk level, and concluded that its water-related risk is low.</p> <p>The Entity has published statistics on its water usage in an inventory table, available at: http://www.cqjszp.com/news_detail.aspx?id=81</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risk is low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk to and potential impacts on Biodiversity and Ecosystem Services, identifying five sources of risk including air pollution, water pollution, intentional introduction, unintentional introduction, and natural introduction. It was determined that the overall Biodiversity risk is low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the risk to Biodiversity and Ecosystem Services is low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the risk to Biodiversity and Ecosystem Services is low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the risk to Biodiversity and Ecosystem Services is low and no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has assessed the risk of introduction of Alien Species through intentional, unintentional, and natural introduction. It was determined that no Alien Species were present near its premises and the Entity is committed to establishing a monitoring station to cooperate with local investigations and testing.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Properties near the Entity and the Entity is committed to not entering designated World Heritage Properties.

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8.6a-d Protected Areas	Conformance	There are no Protected Areas located adjacent the Entity, with the closest over two kilometres away. An assessment has determined that the Entity's operations have a negligible impact on this Protected Area. The Entity remains committed to implementing necessary controls for future changes to the Entity's premises or the presence of Protected Areas arise.
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	Minor Non-Conformance	<p>The Entity has implemented a Human Rights Due Diligence Management Procedure, which requires a Human Rights Policy, risk assessment, Stakeholder engagement, employee training, and reporting. The Human Rights Due Diligence and consultation form addresses working conditions, salaries, recruitment, and related issues.</p> <p>The Entity has established a Commitment Letter on Respecting Human Rights and Promoting Gender Equality that upholds Human Rights, ensures gender equality, prohibits Discrimination, and prevents abuse. The Commitment Letter is reviewed every five years or as needed for significant changes, and is available at: http://www.cqjszp.com/news_detail.aspx?id=94</p> <p>However, the Human Rights Due Diligence Management Procedure does not include a review cycle nor sufficient employee consultation.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has implemented a Gender Equality and Women's Rights Management Procedure, which addresses equal opportunities, non-Discrimination, diversity, zero tolerance for Violence, and transparency in recruitment and promotion. It ensures fair employment practices, maternity and parental leave, equitable salaries, and active support for women's participation. The Procedure addresses career barriers, enforces non-Discrimination, and requires re-evaluation every five years or upon Material changes.</p> <p>However, no project impact analysis has been provided, and some recruitment notices are not open to female candidates.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial development zone and there are no nearby residential areas or Indigenous Peoples.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial development zone and there are no nearby residential areas or Indigenous Peoples.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial development zone and there are no nearby residential areas or Indigenous Peoples.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has provided a Declaration of Cultural Heritage and Religious Holy Sites, which identifies that no cultural or sacred heritage sites or values are located near the Entity. The Zhouzhuang Ancient Town and Qiangeng Ancient Town are both approximately 20 kilometres away.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no cultural heritage or sacred sites or values in the vicinity of the Entity.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes that have required resettlement since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is located in an industrial development zone, away from residential areas. It has developed an Assessment and Response Measures Framework to address the rights and interests of affected groups, including local environmental authorities, safety agencies, and nearby communities. The assessment covered the impacts on employment, agriculture, health, safety, and the environment, and categorised the risks and defined response measures. No negative feedback has been received from the local environmental authority or dormitory rental company. The framework mandates assessments every five years or upon significant changes or control deficiency, and is available at: http://www.cqjszp.com/news_detail.aspx?id=95
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Supplier Social Responsibility Control Procedure, which requires documentation or on-site audits of suppliers' social responsibility performance. Additionally, the Entity has issued a Declaration on Conflict-Affected and High-Risk Areas (CAHRAs), which prohibits direct or indirect purchases of Aluminium from such regions.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Approximately 90% of the Entity's raw material is sourced from domestic Aluminium processing Scrap, with the remaining material as Primary Aluminium sourced from Traders. No materials or products linked to conflict minerals were found among suppliers.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity requires its suppliers to sign a Social Responsibility Commitment Letter, which requires responsible procurement throughout the supply chain. No materials or products linked to conflict minerals were found among suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted an annual supplier review, which addresses social responsibility. The Entity's Due Diligence practices were independently audited as part of this ASI Audit, which meets the requirements for this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has committed to report the results of its supply chain Due Diligence annually in a CAHRAs statement. However, the Entity has not disclosed a CAHRAs statement on supply chain Due Diligence.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has signed a security agreement with a security company that establishes the guidelines for the inspection of goods and monitoring of employees. The Entity evaluates the performance of security personnel.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Laws related to Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has documented the employees' right to freely associate and collectively bargain, including the right to voluntarily choose Trade Union membership. There is no Union at the Entity, however, an employee representative system is established, where elected representatives assist with issues related to employees' core interests, such as complaints, Discrimination, unfair treatment, safety, environment, and welfare.
10.2a Child Labour	Conformance	The Entity has implemented a Policy to prohibit Child Labour and protect young Workers. The youngest employee at the Entity is 25 years old, and the on-site Audit confirmed there are no instances of Child Labour, including the Worst Forms of Child Labour.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity prohibits prisoner, bonded, and Forced Labour. Workers sign employment contracts directly with the Entity, and outsourcing companies are not used. There are no punitive deductions, unreasonable expenses, or debt labour, and employees have the freedom of movement. This was confirmed during Worker interviews and as disclosed in the 2023 Sustainable Development Report. The Sustainable Development Report additionally includes information on the Entity's Human Rights performance indicators and summarises its efforts and achievements in respecting and protecting Human Rights, non-Discrimination and Forced Labour, including modern slavery.</p> <p>However, although the Sustainable Development Report has some information regarding modern slavery, it is insufficient and does not fully meet the details of a Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has developed a document outlining its commitment to preventing Discrimination and ensuring equal treatment of all employees. The Entity provides equal pay for equal work. Worker interviews undertaken during the Audit identified a positive work environment and a culture free from Discrimination.
10.5 Communication and engagement	Conformance	The Entity has established methods for internal and external communication, including contact numbers, mailboxes, and suggestion boxes to facilitate employee interaction. Management's contact information is publicly shared to encourage communication, and employees, informed through interviews, are assured that these methods are safe from retaliation.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented an ASI Policy prohibiting Violence and Harassment, which is displayed in the factory and public event space for employee access, and is available on the Entity's website:

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		<p>http://www.cqjszp.com/news_detail.aspx?id=85</p> <p>There have been no reported incidents of Violence or Harassment. An employee representatives' system is in place to assist Workers to raise such issues. The Policy, newly developed, will be reviewed for effectiveness during the annual internal audit and management review.</p>
10.7a-c Remuneration	Conformance	The Entity recruits its own employees, and both parties sign a labour contract that outlines the terms and complies with local laws and regulations. The Entity pays wages above the local minimum wage and provides Overtime compensation according to legal requirements. A review of processed wages confirms compliance with local Overtime regulations. Payroll is processed via bank transfer in accordance with local regulations. Employees' wages are paid through the Entity's designated bank, and detailed salary and bank transaction records are available.
10.8a-c Working Time	Conformance	The Entity's Employee Handbook outlines a working hours system that complies with statutory requirements, including clear shift times. Office staff follow an 8-hour workday, while some on-site workshops, like the casting workshop, operate on a four-shift, three-operation system. The attendance system shows that employees receive one day off every six days, with monthly Overtime not exceeding 40 hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established a document on Freedom of Association and Collective Bargaining, ensuring employees' rights are protected through the ASI Policy. An employee representatives' system is in place, where elected front-line employees assist colleagues in defending their rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has established an ISO 45001 certified Occupational Health and Safety (OH&S) Management System.</p> <p>However, it was identified during the Audit that some workshops had damaged firefighting facilities and missing evacuation signs. Additionally, there are instances where personnel in certain workshop positions are not wearing personal protective equipment.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented an OH&S Management System and completed the initial audit in October 2023. The certificate remains valid, and all target indicators have been achieved. The Entity conducts regular internal audits and management reviews, evaluating OH&S performance and identifying areas for improvement.</p> <p>However, the Entity has not disclosed the effectiveness of the OH&S Management System through the use of leading and lagging indicators or comparative analyses of its performance with peer businesses and leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity conducts an annual internal audit and management review of its OH&S Management System to evaluate performance. It has established an employee representatives' system as a mechanism for elected representatives to assist employees with OH&S issues. Employees are aware of the Entity's Health and Safety Policies and

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		complaints procedures and are assured that they can use them without retaliation.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	28 February 2025	Initial Certification Audit – Provisional Certification