ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

UACJ Automotive Whitehall Industries, Inc.

CERTIFICATE NUMBER

427

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

25 FEBRUARY 2025

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

24 FEBRUARY 2028

ASI ACCREDITED AUDITING FIRM

BUREAU VERITAS CERTIFICATION

CERTIFIED SINCE

25 FEBRUARY 2025

AUTHORISED BY

The

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

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Guanajuato, Mexico.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	UACJ Corporation				
ENTITY NAME	UACJ Automotive Whitehall Industries, Inc.				
CERTIFICATION SCOPE	Manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Guanajuato, Mexico.				
SUPPLY CHAIN ACTIVITIES	Semi-FabricationMaterial Conversion				
ASI STANDARD	Performance Standard V3				
AUDIT TYPE	Initial Certification Audit				
AUDIT FIRM	Bureau Veritas Certification				
AUDIT DATE	• 8 – 10 October 2024				
AUDIT REPORT SUBMISSION	• 5 December 2024				
AUDIT SCOPE	The Audit Scope included the manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Guanajuato, Mexico				
	Supply chain activities included in the Audit Scope:				
	Semi-FabricationMaterial Conversion				
	All applicable 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. 				
CERTIFICATION PERIOD	25 February 2025 - 24 February 2028				

NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	25 August 2026
CERTIFICATE NUMBER	427



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: https://aluminium-stewardship.ethicspoint.com/

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Founded in 1974, UACJ Automotive Whitehall Industries (UWH) has established itself as a leader in the automotive industry, specialising in precision extruded Aluminium components and assemblies. With headquarters in Ludington, Michigan, and additional plants in Paducah, Kentucky; Flagstaff, Arizona; and San Miguel de Allende, Guanajuato, Mexico, UWH is strategically positioned to serve a diverse range of customers across North America.

UACJ Automotive Whitehall Industries Mexico currently has more than 300 employees on site and during 2024 shipped approximately nine thousand tonnes of products to the North American and European markets.

UACJ Automotive Whitehall Industries Mexico (the 'Entity') started operations in 2011, with a total of 23 employees and a production area of approximately 4,750 square metres (m²). Initially, the Entity only manufactured Aluminium sunroof tracks, of which in 2012 it shipped approximately 30 tonne of sunroof racks to it is respective customers in North America.

In 2020, the Entity expanded its operations with the construction of a second Facility and a production area of approximately 8,000 square metres (m²). During 2021, New Projects were added to the Entity, thereby increasing the Entity's scope of operations. It should be noted that among the primary products are sunroof tracks, convertible top components, and structural components of different Aluminium alloys such as CNC Machining, Bending, Welding, Fabrication, Assembly and CMM analysis is also undertaken on site.

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	High	High	Medium	HIGH
RISKS	High	High	Medium	HIGH
PERFORMANCE	Medium	High	High	HIGH
OVERALL		HIG	ЭН	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity's legal compliance is assured via the UACJ Group Code of Conduct Handbook and the UACJ Group Policy on compliance with competition law. The Facility maintains a legal registry that was last updated in 2023 and was reviewed in January 2024.
1.2 Anti-Corruption	Conformance	The Entity works to prevent Corruption and Bribery in accordance with Applicable Law and has established a UACJ Group Anti-Bribery Code of Conduct and Policy on Prevention of Bribery. https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01
1.3a-e Code of Conduct	Conformance	The Entity has implemented the UACJ Group Code of Conduct to establish Environmental, Social and Governance (ESG) requirements, available at: https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01
2. POLICY AND MANAGEMEN	IT	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented the UACJ Group Policies addressing ESG Policies. The Policies are available at: https://www.uacj.co.jp/english/sustainability/environment/management.htm
2.2a-c Leadership	Conformance	The Entity has identified the Plant Manager at its Mexico Facility with the responsibility and authority to ensure conformance with the requirements of this ASI Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has integrated Environmental and Social Management principles into its Management System. The UACJ Group has established an Environmental Committee as a body that represents the entirety of the Group. The Environmental Committee, chaired by the President, has a membership consisting of UACJ executives, chief executives, plant managers, and presidents of principal Group companies. The Committee meets three times a year to provide updates on the status of environmental activities and discuss aims and objectives for the following fiscal year's environmental activities.
2.3b Environmental and Social Management	Conformance	The Entity has incorporated the UACJ Group, Social Management principles and tenants into its Management System.
Systems - Social		The UACJ Group Code of Conduct emphasises respect for basic labour rights, and states that employees' basic rights to work shall be respected in accordance with various labour-related laws and regulations in each country and region.
2.4a-e Responsible Sourcing	Conformance	The Entity has identified and implemented Sustainable Procurement Guidelines in accordance with UACJ Corporate CSR Deployment Guidelines and the UACJ AutomoUACJ Automotive Whitehall Supplier Handbook. The UACJ Group Sustainable Procurement Guidelines are available at: https://www.uacj.co.jp/english/sustainability/social/fairtrade.htm.

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
Assessments		However, when considering a new site or project expansion, the potential environmental, social, cultural and Human Rights impacts are assessed. The Mexico Facility completed an expansion in 2021. At that time, the potential impacts were reviewed, and a land use permit was issued by the regulatory agency.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
		However, when considering a new site or project expansion, the potential environmental, social, cultural and Human Rights impacts are assessed. The UACJ Human Rights Policy (Section 7) outlines their commitment to identify the negative impacts and risks of Human Rights in business activities. https://www.uacj.co.jp/english/sustainability/social/human-rights.htm
		The Mexico Facility expanded the site in 2021, and an assessment was conducted at that time to evaluate any potential impacts. The expansion was completed on the existing property and did not impact the surrounding communities.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented site-specific Emergency Response Plans. These plans are developed with consideration and input from the Workers and the Local Community. The Mexico Facility's plan was last updated in 2024, and a drill was conducted in September 2024, for each shift. The Entity's contingency plan is available to the public upon request and has been provided to the local agencies.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a contingency plan that specifies specific situations that may significantly affect or suspend the Entity's activities. These situations are simulated and evaluated annually to determine the actions necessary to reduce or mitigate the impacts.
2.9a-b Mergers and Acquisitions	Conformance	As part of the UACJ Group, the Entity reviews ESG issues as part of its Due Diligence process for mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	As part of the UACJ Group, the Entity reviews ESG issues in the planning process for closure.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity reports its governance approach and material environmental, social and economic impacts via the 2024 Integrated Report, as provided on the UACJ Corporate website, page 60: https://www.uacj.co.jp/english/ir/library/factbook.htm
3.2 Non-compliance and Liabilities	Conformance	The Entity commits to publicly disclose non-compliances or liabilities in accordance with Applicable Law. Any significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations are disclosed as part of the Sustainability Report and the GRI Index, section 307-1: https://www.uacj.co.jp/english/sustainability/gri-standard.htm

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Minor Non- Conformance	The Entity's Group Anti-Bribery Regulations and the Global Guidelines on Bribery have been established which prohibit Bribery: https://www.uacj.co.jp/english/sustainability/management/pdf/comp liance_02.pdf The Entity only makes legal payments to government and other entities as outlined in their Code of Conduct and the Anti-Bribery Policy, however, the Entity has not publicly disclosed information regarding payments to governments or disclose the value and beneficiaries of financial and in-kind political contributions.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented plant procedures to address employee issues and concerns in accordance with the Whitehall Employee Handbook (refer section - 5.17 Complaint Procedure) Globally, the UACJ Group operates an internal reporting system the purpose of which is to prevent compliance problems altogether or discover them early on and swiftly resolve them. This system has internal and external channels that employees or Stakeholders can access anonymously. Measures are in place to receive contacts by telephone, postal mail, e-mail, and other means. Customer complaints can be submitted via the customer portal at: https://www.uacj.co.jp/english/inquiry/index.htm
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Corporate Sustainability Division works closely with the operational sites to help satisfy customer requests to provide life cycle information for the major product lines. This information is disclosed at: https://www.uacj.co.jp/english/sustainability/environment/warming.htm#ac0 and https://www.uacj.co.jp/english/sustainability/environment/climate.htm.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The UACJ Corporate Sustainability Report discusses how their customers' needs continue to diversify, and products that help reduce environmental impacts are increasingly demanded. To respond to these needs and demands, the Entity via the Corporate Sustainability Division works closely with the operational sites to help satisfy customer requests including providing life cycle information.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as Product specifications are established by UACJ customers based on their product requirements. However, the Entity works with customers to meet their demand to produce products that have lower environmental impacts.
4.3a-b Aluminium Process Scrap	Conformance	The Entity reviews opportunities for maximising scrap recycling and reuse. Scrap recycling targets at the plant level are established, tracked and reviewed on a weekly basis. In addition, the Entity has established systems for separating Aluminium alloys and grades for recycling at extrusion and fabrication process steps and were observed during the site walkthrough.
4.4a-c Collection and Recycling of Products at End of Life - Material	Conformance	The End of Life strategy for products is the responsibility of the Automotive OEM customers. However, where possible, the Entity supports the customer's End of Life strategies for collection and recycling. The current strategies to increase Aluminium recycling and

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		to utilise more Recycled Aluminium in processes are available in 2024 in a Sustainability Management Presentation: https://www.uacj.co.jp/english/ir/library/pdf/2025/sus_01.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The End of Life strategy for UACJ Automotive Whitehall Industries products is the responsibility of the Automotive OEM customers. Where possible, UACJ Automotive Whitehall Industries supports Customer end-of-life strategies for collection and recycling. The current strategies to increase Aluminium recycling and to utilise more Recycled Aluminium in processes are available in 2024 in a Sustainability Management Presentation: https://www.uacj.co.jp/english/ir/library/pdf/2025/sus_01.pdf
5. GREENHOUSE GAS EMISSION	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity tracks energy consumption and CO ₂ emissions and this information is summarised and reported through the UACJ Corporate website and included in the annual Integrated Report, page 66: https://www.uacj.co.jp/english/ir/library/pdf/2024/03_2024uacjr.pdf
		The Entity's energy sources are disclosed at: https://www.uacj.co.jp/english/sustainability/environment/enterprise.h tm
		The UACJ Sustainability Report is independently verified annually with the latest assurance statement dated August 30, 2024: https://www.uacj.co.jp/english/sustainability/assurance/index.htm
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity updates and publishes their Greenhouse Gases (GHG) Emissions Reduction Plan for North American Facilities. This reduction plan was developed using the ASI GHG Pathway Calculation Tool. All information is summarised and reported through the UACJ corporate website and included in the annual Integrated Report, pages 60, and 66-68: https://www.uacj.co.jp/english/ir/library/pdf/2024/03_2024uacjr.pdf
		The Entity has determined that they need to reduce 75% of their GHG emissions by 2030 compared to 2022 to achieve the target of 0.210 tonne per CO ₂ per tonne shipped according to data calculated for the GHG Pathway Calculation Tool.
		UACJ has established a road map to achieve carbon neutrality (CN) for Scope 1 and 2 emissions by 2050. For 2030, UACJ has set a goal of reducing CO ₂ emissions per unit of production by 30% relative to the 2019 baseline.
5.4 GHG Emissions Management	Conformance	In April 2024, UACJ joined the 'GX League', a group of various companies and organisations working to achieve carbon neutrality.

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		The GX League is a framework for collaboration among industry, academia, and government to achieve the goal of reducing Greenhouse Gas (GHG) emissions.
		The Entity has set a reduction target for CO_2 and other GHG emissions (total of Scope 1 and 2 emissions) is a 19% average reduction in fiscal 2024 and 2025 and a 30% reduction by 2030 and is tracking their CO2 and energy consumption monthly.
		For more information, refer to the annual Integrated report, page 68: https://www.uacj.co.jp/english/ir/library/pdf/2024/03_2024uacjr.pdf
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	Air emissions specific to the Entity's Mexico Facility are disclosed as part of the 'Cedula de Operacion Anual Report' via the regulatory portal as local regulations require. All emissions from the Entity's Mexico Facility are below regulatory requirements, and no action plans are needed.
		The Entity discloses emissions associated with their business activities, available at: https://www.uacj.co.jp/english/sustainability/environment/enterprise.h tm.
6.2a-g Discharges to Waters	Conformance	In accordance with Mexican legislation, a certified laboratory conducts an annual assessment to verify the quality of the water generated and discharged by the processes and equipment used at the site. Water discharges for the site are disclosed as part of the Annual Report required by the regulatory body and as part of its material balance for 2023, which includes discharges of industrial wastewater: https://www.uacj.co.jp/english/sustainability/environment/enterprise.htm
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The site had completed a Spill Risk Assessment and identification of Spills of dangerous substances and leaks that could cause Contamination as part of their Emergency Action Plan. The primary concern relates to cutting lube, and any Spills can be captured onsite and within the building. There have been no significant Spills at the site.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity had completed a Spill Risk Assessment as part of their Emergency Action Plan and procedures for reporting any significant Spills per the local regulations are included in the site's Emergency Action Plan. There have been no significant Spills at the site.
6.5a-c Waste Management and Reporting	Minor Non- Conformance	The Entity has implemented a Waste Management Plan in which strategic initiatives are focused on the reduction and/or the elimination of waste, (hazardous, non-hazardous, recoverable and non-recoverable). Waste generation and management is reported to the local agencies as required. Waste information on the UACJ Corporate Website however has not been update ed since 2022.
		https://www.uacj.co.jp/english/ir/library/factbook.htm#ac2024

CRITERION	RATING	COMMENT
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors Water usage and includes this in the Energy Consumption and CO ₂ Emission Calculation Sheets. All information on water consumption and resources is published on the Corporate website: https://www.uacj.co.jp/english/sustainability/environment/enterprise.htm The Entity has conducted a water risk assessment and the plant in Mexico does not pose a significant risk to the local water supply. The Entity maintains a water balance that identifies the inputs, outputs, uses, quantities and water supply specific to the site.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity presents no material risks to local water supplies. The Mexico Facility actively reviews opportunities to reduce water consumption in their manufacturing processes.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has completed a Biodiversity assessment to review the potential risks and impacts on Biodiversity from their current land use and activities. No specific Biodiversity impacts have been identified for the Mexico site.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks or impacts identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks, or impacts identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks, or impacts identified.
8.4 Alien Species	Conformance	All import and export shipments from the Entity use heat treated pallets to prevent the introduction of Alien Species from suppliers and to receiving locations.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not explore or develop new projects within World Heritage Properties. For the San Miguel de Allende facility, it is located on the outskirts of the city and according to UNESCO information, only the centre of San Miguel de Allende is considered a World Heritage Site.

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		https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01
8.6a-d Protected Areas	Conformance	The Entity has referenced the WDPA database to identify any Protected Areas impacted by their operations. No Protected Areas have been identified within the Area of Influence for the Mexico Plant.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity follows the Human Rights requirements set forth in the UACJ Group Code of Conduct and in the UACJ Human Rights Policy. The Human Rights Policy is published on the UACJ Website at https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_CSR_HumanRightsPolicy_en.pdf
		The Entity via the UACJ Group has implemented and conducted Human Rights Due Diligence to identify, mitigate, and prevent the emergence of Human Rights risks throughout their operations and business activities. Information on the Human Rights Due Diligence is included in the UACJ Report 2024, page 75: https://www.uacj.co.jp/english/ir/library/pdf/2024/full_a3_2024uacjr.pdf
		The Entity has identified two key initiatives to eradicate Human Rights abuses: https://www.uacj.co.jp/english/ir/policy/long_term_vision.htm
		The Mexico Facility has delivered all training specific to compliance and Human Rights issues through the Group Code of Conduct.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is making a concerted effort to increase opportunities for women to play an active role in its operations and has set targets to increase the percentage of women in its workforce to a minimum of 20%. In 2022, women represented 12.6% of the newly appointed managers. The Mexico Facility currently employs 351 employees of which 222 are women.
		Women in managerial positions is a key metric tracked by the Entity and is presented as one of the five Materiality targets in the UACJ Integrated Report, page 60: https://www.uacj.co.jp/english/ir/library/pdf/2024/03_2024uacjr.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. The Facility operates in an existing industrial park.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. The Facility operates in an existing industrial park.

CRITERION	RATING	COMMENT
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 there are no New Projects or Major Changes that require Free Prior and Informed Consent (FPIC).
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage sites in the Entity's Area of Influence. The Facility operates in an existing industrial park.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as operations do not affect Indigenous Peoples' lands, territories, resources or cultural and sacred heritage.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes that require resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity engages with Local Communities to ensure local legal rights are respected and that no negative community impacts are created from their operations and have Policies and procedures outlining these requirements. Specifically, the Entity has collected donations for local emergency providers and provides gifts and clothing to children in the Local Community.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Sustainable Procurement Policy: https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_Sustain able_Guidelines.pdf The Entity does not operate in and will not purchase raw materials from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity's Risk Assessment process is outlined in their Supplier Quality Manual. Suppliers are reviewed and assessed at least every three years to ensure they are in compliance with the Sustainable Procurement Guidelines and that any identified risks are addressed. All Aluminium suppliers for the Entity must be International Automotive Tas Force (IATF) Certified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's suppliers are reviewed and assessed at least every three years to ensure they are in compliance with the Sustainable Procurement Guidelines and that any identified risks are addressed.
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	Suppliers are reviewed and assessed at least every three years to ensure they comply with the Entity's Sustainable Procurement Guidelines. This information is reviewed at least annually by the Entity's compliance committee and is disclosed in the annual Modern Slavery Statement, available at: https://www.uacj.co.jp/sustainability/msa/pdf/2023_msa.pdf

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity utilises a third-party company to provide security services at the site. Their security and respect for Human Rights are addressed in accordance with local laws and regulations and are included in the contract language. Security personnel are also required to complete the UACJ Code of Conduct training.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The UACJ Group Code of Conduct addresses Freedom of Association with Labour Unions, the Entity's employees belong to a Labour Union and a labour agreement is in place.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Mexican law does not restrict Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity verifies Workers' age upon hire and no Workers are currently under the age of 18.
10.3a-c Forced Labour	Conformance	The UACJ Group Code of Conduct stipulates that neither Child Labour nor Forced Labour is allowed by any UACJ entity. The Entity does not hold any employee identification papers, and all employees are verified at the time of hire and are required to be registered to pay the government required social security taxes. The UACJ Statement on Modern Slavery was approved by the company's Board of Directors in September 2023, and is available at: https://www.uacj.co.jp/sustainability/msa/pdf/2022_msa.pdf
10.4a-c Non-Discrimination	Conformance	The UACJ Group Code of Conduct stipulates that the Entity must respects the Human Rights of all people and does not engage in irrational Discrimination or harassment based on race, creed, gender, language, religion, ideology, or social origin. Refer to: https://www.uacj.co.jp/english/sustainability/social/diversity.htm Code of Conduct training is provided to all employees.
10.5 Communication and engagement	Conformance	The Entity encourages open engagement with Workers, both between worker committees and individually. Workers are encouraged to participate and engage without fear of reprisal.
10.6a-g Violence and Harassment	Conformance	The Entity does not engage in corporal punishment, mental or physical coercion, verbal abuse or harassment. This is outlined in the Group Code of Conduct and in the Human Rights Policy. https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01 Any actions that would be taken if a complaint was made would be discussed and there are procedures in place which include consultation with the employee and any union representative. No complaints have been received.
10.7a-c Remuneration	Conformance	The Entity pays living wages established by the labour contract and in accordance with the applicable local law. Working Time is maintained

CRITERION	RATING	COMMENT	
		in an electronic pay system. Employees are paid on a weekly basis by means of an automatic bank deposit.	
10.8a-c Working Time	Conformance	The Entity operates on three shifts, with shift schedules in accordance with local law and the labour contract. Working hours are recorded in an electronic payroll system. Vacation and holidays are also paid in accordance with local law.	
10.9a-b Informing Workers of Rights	Conformance	Workers' Rights are clearly presented in the employment agreement that all employees must sign before commencing employment. This is also outlined in the site-specific employee handbook.	
11. OCCUPATIONAL HEALTH AND SAFETY			
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	As part of UACJ Whitehall, the Entity has implemented an Occupational Health and Safety (OH&S) Management System at the corporate level that is reviewed annually by the EHS department in order to ensure that all established local laws and regulations are complied with and that all established procedures are reviewed and approved by the Plant Manager. The Entity has implemented a Group Policy specific to Health and Safety. This Policy is communicated to all employees and is available at: https://www.uacj.co.jp/english/sustainability/social/safety.htm	
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The OH&S Management System elements are published on the UACJ website which includes Performance data including leading and lagging indicators and comparative analyses with peer businesses: https://www.uacj.co.jp/english/sustainability/social/safety.htm https://www.uacj.co.jp/english/sustainability/social/health.htm	
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an active Safety Committee that meets at least quarterly and includes representatives from the 'shop floor' as well as from management. The most recent safety committee meeting minutes were reviewed, and the meetings included feedback from the employees identifying potential safety issues.	

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 February 2025	Initial Certification Audit – Full Certification