

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Ningbo IKD Technology Industry Development Co., Ltd

CERTIFICATE NUMBER
435

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

DATE OF ISSUE
9 APRIL 2025

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

DATE OF EXPIRY
8 APRIL 2026

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

CERTIFIED SINCE
9 APRIL 2025

AUTHORISED BY

CERTIFICATION SCOPE

Manufacture of Aluminium-
containing parts in Ningbo,
Zhejiang Province, China.

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

* 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	IKD Co., Ltd.
ENTITY NAME	Ningbo IKD Technology Industry Development Co., Ltd
CERTIFICATION SCOPE	Manufacture of Aluminium-containing parts in Ningbo, Zhejiang Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">15 – 20 November 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">24 December 2024
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium-containing parts at Ningbo IKD Technology Industry Development Co., Ltd.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <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	9 April 2025 – 8 April 2026
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE	8 October 2025
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CERTIFICATE NUMBER	435
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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.

ENTITY OVERVIEW

Ningbo IKD Technology Industry Development Co., Ltd., (the 'Entity') is located in Cicheng Town, Jiangbei District, Ningbo City, Zhejiang Province. Its main products are for the new energy automobile three electric systems, integrated moulding components and other Aluminium alloy casting products, with the process including die-casting, deburring, fine machining, inspection and packaging. The Entity's annual output for various types of large-scale Aluminium alloy casting products is currently 10 million pieces. The Entity exports its Aluminium alloy casting products to manufacturers in Europe and North America.

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	Low	Low	LOW
RISKS	Medium	Low	Low	LOW
PERFORMANCE	Medium	Low	Low	LOW
OVERALL	LOW			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a laws and regulations control procedure, and complies with national and international laws. It has detailed descriptions for conducting audits and compiling lists of Applicable Laws.</p> <p>However, some relevant Applicable Laws are not included in the list and the assessment of Compliance was not undertaken as per the Entity's requirements.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an anti-Corruption and anti-Bribery management procedure. An anti-Bribery management team has been established and has undertaken regular assessments in accordance with the Bribery risk assessment level standard, and employees have been regularly trained. The Entity's Administration Department summarises and evaluates the implementation of anti-Bribery activities annually to determine the status of Bribery risk and whether measures are sufficient and effective.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has formulated a Code of Conduct, including environmental, social and governance principles. The Entity undertakes an internal audit and reviews the Code of Conduct in the annual management review. The Code is updated annually following any change in Applicable Law and/or business trends. Awareness of the Code of Conduct for staff is raised through various measures, including meetings and training. The Code of Conduct is publicly at: https://www.ikd-china.com/web/pdf10/2.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has established an ASI Performance Standard Manual, including Policies and procedures. The Entity has established the Environmental, Social, and Governance Policies, which is approved by the General Manager, and publicly available at: https://www.ikd-china.com/web/pdf10/3.pdf</p> <p>However, based on interviews conducted during the Audit, it was found that employees were not familiar with the ASI Environmental, Social, and Governance Policies.</p>
2.2a-c Leadership	Conformance	<p>A Management Representative has been appointed, and the responsibility and authority are clearly defined. This role has overall responsibility and authority for ensuring Conformance with the ASI Performance Standard, and implementation and communication of relevant Policies, and has sufficient authority to provide required resources for establishment, implementation, maintaining and improvement the Management Systems required throughout the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 Certificate.</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented an integrated Management System. The Entity has obtained the ISO 14001:2015, ISO 45001:2018 certificate. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity's Policy is reviewed at least every five years or after any changes to the Business. The Responsible Procurement Policy is available at: https://www.ikd-china.com/web/pdf10/4.pdf</p> <p>Responsible sourcing is implemented by the Entity through signing ASI Commitment Letters, undertaking supplier assessments and an emphasis on suppliers to implement the ASI Performance Standard requirements.</p> <p>However, the Entity has not implemented its Supplier Management Procedure effectively and some suppliers have not signed commitment letters, nor had an assessment conducted.</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 to the existing Facility have occurred since the Entity joined ASI, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be undertaken as a part of mandatory reviews of project documentation by responsible state bodies.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to the existing Facility have occurred since the Entity joined ASI, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be undertaken as a part of mandatory reviews of project documentation by responsible state bodies.
2.7a-f Emergency Response Plan	Conformance	The Entity holds both an ISO 14001 and ISO 45001 certificate. Emergency Response Plans are developed, implemented and reviewed every five years, or after any changes to the Business, or changes in the nature or scale of emergency incident risk. Worker training and drill records were verified during the Audit. The Emergency Response Plan is available at: https://www.ikd-china.com/web/pdf10/26.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a resilience plan to address the suspension or significant change in operations due to situations such as conflict, pandemic, natural disaster, or cyber-attack.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a mergers and acquisitions management procedure. Until now, no mergers and acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestment activities are not planned for the immediate future. When applicable, activities around closure, decommissioning and divestment will be driven by Corporate functional teams and review of environmental, social and governance

CRITERION	RATING	COMMENT
		consequences will be undertaken in consultation, where possible, with the participation of Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has prepared an annual sustainability report that describes their sustainability approach, and summarises their environmental and social impacts. The Social Responsibility Report is available via the Entity's disclosures webpage, or directly at: https://www.ikd-china.com/zixunDetail/526.html https://www.ikd-china.com/web/pdf10/5.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>No non-compliance or liabilities were reported in the Entity's Social Responsibility Report. According to the government-related websites (https://www.gsxt.gov.cn) and non-government organisation websites (https://www.qcc.com/), no such case was raised by the government agencies.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in the Entity's Annual Financial Audit Report, and tax payment certificates are available. The Financial Report information can be accessed at: https://www.gsxt.gov.cn/index.html</p> <p>No financial or in-kind political contributions have been made, which is disclosed in the Social Responsibility Report: https://www.ikd-china.com/web/pdf10/5.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established and implemented a Stakeholder complaints, grievances and requests procedure, which has been developed for the disclosure of the Entity's contact telephone number, email address, suggestion box and other information to Stakeholders by means of public notice board, and to accept inquiries, complaints and appeals from all parties. The Entity's Human Resources Department tracks the requests and complaints of Stakeholders and has an appropriate Grievance Resolution Mechanism. The Entity's procedure is available at: https://www.ikd-china.com/web/pdf10/15.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the Life Cycle Assessment (LCA) requirements. The Entity's LCA is based on the 'Greenpro' system (develop by Phoenix). LCAs for all related Products have been developed according to the Entity's management procedure and the LCA report illustrate the defined procedures and process are followed accordingly. Refer to: https://www.ikd-china.com/web/pdf10/6.pdf</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has provided adequate 'cradle-to-gate' Life Cycle Assessment (LCA) information on its Aluminium product. The LCA focuses on environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments. LCA studies</p>

CRITERION	RATING	COMMENT
		are available upon customer request. The Environmental Life Cycle Assessment Report is available at: https://www.ikd-china.com/web/pdf10/6.pdf
4.2 Product Design	Conformance	The Entity has established and implemented a Product design procedure, and integrates relevant objectives into the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations, and the generated target of Scrap for collection, recycling and/or re-use is 100%. The Entity has a Scrap classification and management procedure to classify and dispose of the different types of Aluminium Scrap. All Scrap is disposed of at a smelter. Related records are kept for review.
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	Minor Non-Conformance	<p>The Entity has developed a recycling strategy including specific timelines and targets. There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity has communicated with its main customers on how to improve the recycling rate of Products at End of Life. The Entity maintains records associated with its recycling contracts with customers for the collection of scrap of Products at End of Life.</p> <p>However, the Entity's actions and measures are not sufficiently visible, without the related implementation activity presented within the plan.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has accounted for and publicly disclosed Material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis on its website, available at: https://www.ikd-china.com/web/pdf10/7.pdf</p> <p>The GHG emission data are verified by a third party, and the verification statement is available at: https://www.ikd-china.com/zixunDetail/527.html</p> <p>However, Scope 3 Category 1 GHG emissions data were not included in the publicly disclosed information.</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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Major Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan with a GHG emissions reduction target for 2024 to reduce GHG emissions per product based on 2023 levels. The Entity's main strategy is to reduce electricity consumption and increase the ratio of green energy. The Entity reviews its GHG Emissions Reduction Plan annually or upon changes to the Business that alters baselines or targets. The Entity's reduction target is available at: https://www.ikd-china.com/web/pdf10/11.pdf</p> <p>However, the Entity's GHG Emissions Reduction Plan does not fully address upstream procurement and the GHG Emissions Reduction Pathway has not been established using the ASI methodology to ensure alignment with a 1.5°C warming scenario. Additionally, the Entity has not established and disclosed Intermediate Targets, including one within five years and an 'end point' target for 2050.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has established a GHG emissions Management System, including related tools, database, inventory and targeted emission reduction pathways. The Entity has implemented a GHG management procedure and emission source identification table to monitor the GHG emissions and achieve performance aligned to the GHG Emissions Reduction Plan and targets developed.</p> <p>However, the Entity's GHG emissions Management System did not perform satisfactorily to meet the GHG emissions management requirements of the ASI Performance Standard.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's Emissions to Air are quantified in the Environmental Impact Assessment report. Pollution treatment facilities are in use and the Entity's air emissions are monitored regularly and emissions are within legal limits. The Entity has established a plan to minimise exposure to and impacts of Emissions to Air. The Water, Air and Waste Reduction Plan is available at: https://www.ikd-china.com/web/pdf10/13.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are addressed and managed within the Entity's Environmental Management System. The Entity has established water reduction targets and a related plan to minimise adverse impacts. Monitoring of Discharges to Water is undertaken, and results for major pollutants are within legal limits. The Water, Air and Waste Reduction Plan is available at: https://www.ikd-china.com/web/pdf10/13.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity conducts regular Spill and Leakage assessments. No high-risk situations are identified and the Entity has taken preventive action or implemented improvement programs for the potential risks identified. The assessment and management plans are defined in the Entity's Environmental Management System and the control measures are included in the list of Spill risk factors. Major Spills and Leakages are handled and communicated by the emergency response team. The assessment and management plan are reviewed at least annually, and can be accessed at: https://https://www.ikd-china.com/zixunDetail/527.html https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ikd-china.com%2Fweb%2Fpdf%2F21.xls&wdOrigin=BROWSELINK</p>

CRITERION	RATING	COMMENT
		However, based on the document review, the Spills and Leakage risk factors list was not complete, with some risks not included.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's Emergency Response Plan (ERP) and response guide define how to dispose of and report Spills and Leakages. If there is Spill, the Emergency Response Team would follow the response process to deal with it accordingly. Spill drills are conducted annually to ensure the process is up to date. No Spill has occurred in recent years. The ERP defines that the Entity will report Spills to the local authorities and impacted units and people immediately and disclose the details in the annual Social Responsibility Report.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has an ISO 14001 certified Environmental Management System. The Waste Management Procedure defines the processes to collect and dispose of all Wastes, and the Entity has established continual improvement targets to reduce the waste generation per unit. The targets are reviewed quarterly by the management team. The quantities of Hazardous and Non-Hazardous Wastes generated by the Entity and the disposal methods are reported in the Social Responsibility Report:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ikd-china.com%2Fweb%2Fpdf10%2F23.docx&wdOrigin=BROWSELINK</p> <p>However, based on the document review, the Entity did not assess the Material impacts to both human well-being and the environment of the Waste materials.</p>
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	<p>The Entity has undertaken a water-related risk analysis, including a water balance, to determine and map the source and type of water it draws and uses. The Entity has a water balance statistical data table for 2023, water resources management goals and plans, and a water balance chart. The Entity has also conducted water risk assessments. The water risk assessment considered the Entity's industrial park location and nearby lands and waterways risk in their Area of Influence, and the level of water-related risk was assessed as low.</p> <p>The Entity's Water Resources Risk Assessment is available at: https://www.ikd-china.com/web/pdf10/10.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined there were no significant water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has established procedures for the protection of Biodiversity. A Biodiversity risk assessment report has been prepared. The Entity is in an industrial park developed by local government, and there is no protected flora or wildlife in this area. The risk assessment determined that there are no significant risks of Biodiversity impact.
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 did not identify significant risk or impact on Biodiversity or Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impact on Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has established a Biodiversity protection procedure, which addresses Alien Species including the evaluation and control of the risks of Alien Species accidentally introduced through operational activities.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has established the requirements for "No Go" in World Heritage Properties in its ASI Performance Assurance Manual, which includes a commitment to not explore or develop New Projects in World Heritage Properties. The Entity is in an industrial park developed by the local government, and there are no World Heritage Properties in this area.
8.6a-d Protected Areas	Conformance	The Entity has established the requirements for Protected Areas in its ASI Performance Assurance Manual. The Entity is in an industrial park developed by the local government, and there are no Protected Areas in this area.
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 established a Social and Environmental Governance Policy, which includes a policy commitment to respect Human Rights, respect employees' civil rights and eliminate Discrimination. The Policies are available for internal and external Stakeholders by training, and are reviewed at least every five years, or as required following annual risks assessments. The Entity has published the Policies via posts on-site and on the website at: https://www.ikd-china.com/web/pdf10/3.pdf</p> <p>The Entity has established a Human Rights Due Diligence procedure, conducted Human Rights Due Diligence and issued a Human Rights Due Diligence report. No adverse Human Rights impacts have been reported since the Entity's establishment and therefore remediation is not required. The Entity commits to respect Human Rights and aims to</p>

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		<p>extend this commitment in the supply chain, and has established a Human Rights Due Diligence process covering the supply chain.</p> <p>However, a sample of assessments determined that some suppliers have not completed the Human Rights Due Diligence assessment.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has developed a women's protection management procedure to address women's rights and interests. The Entity has established a gender equality project implementation plan, which is reviewed annually. No complaint has been received from women Workers. The Entity discloses its gender equity measures at: https://www.ikd-china.com/web/pdf10/24.pdf</p> <p>However, the equality project plan is not complete, and the measures and methods to evaluate the plan require improvement.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
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 Indigenous Peoples within the Entity's Area of Influence and Free, Prior and Informed Consent (FPIC) has not been required.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has formulated a cultural and sacred heritage protection management procedure. Based on the Construction Project Environmental Impact Report, issued by the Zhejiang Province Environmental Protection Bureau, there are no cultural or sacred heritage sites or values in the Entity's location within an industrial park developed by the Ningbo government.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since joining ASI that could cause displacement, or require Resettlement or land acquisition.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity has formulated and implemented an Affected Populations and Organisations management procedure to commit to respect the legal and customary rights and interests in their lands and livelihoods and their use of natural resources, while exploring opportunities to respect and support community livelihoods within the Industrial Economic Zone. There have been no complaints received from Local Communities.</p> <p>The Entity is in contact with surrounding communities. Most of its employees are from the local area. The Entity participates in</p>

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		<p>community public welfare activities, and has established a plan to support the surrounding communities, available at: https://www.ikd-china.com/web/pdf10/29.pdf</p> <p>However, the plan to support the surrounding communities was not complete, without prevent, monitor the Health and Safety and environmental impact from its activities.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity has established a Management System including a supply chain Policy, responsibilities and resources, information gathering and supplier engagement, associated with exercising Due Diligence over its supply chain to avoid involvement in armed conflict or Human Rights abuses. The Entity's Conflict-Affected and High-Risk Areas Policy (CAHRA) Policy is available at: https://www.ikd-china.com/web/pdf10/19.pdf</p> <p>Review of internet resources and interviews with management, employees and workshop leaders did not identify any contribution to armed conflict or Human Rights abuses.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Minor Non-Conformance	<p>The Entity has conducted a risk-based Due Diligence process over their supply chain, which is embedded in the integrated Management System and in the purchasing procedures. No actual or potential risks are identified in the Due Diligence record.</p> <p>However, based on the document check, the information relevant to smelters in the Entity's supply chain was not clearly identified.</p>
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 risk-based Due Diligence did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity has conducted a risk-based Due Diligence process on their supply chain and the supply chain and suppliers are reviewed annually. The Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity has reported on its supply chain Due Diligence in accordance with by requirements of its Conflict Minerals Policy and supplier sustainability approach. The Entity's Supply Chain Due Diligence Report is available at: https://www.ikd-china.com/web/pdf10/14.pdf</p>
9.9 Security practice	Conformance	The Entity has implemented a security services management procedure. The Entity has clearly defined the primary role of security guards to protect people, property and or assets and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law in China.

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10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has established and implemented a Freedom of Association and collective consultation procedure to respect the right to Freedom of Association and to Collective Bargaining. The Entity commits itself to respect the Workers' rights. A Labour Union and association for Workers have been established in accordance with the legal requirements and operates on behalf of Workers to address their rights, e.g., remuneration, working hours, rest and vacation, Health and Safety, vocational training, insurance and welfare.
10.2a-c Child Labour	Conformance	The Entity has formulated and implemented a Policy on the prohibition of Child Labour. Young Workers are under special protection by the Labour Standards Law and are not allowed to work in hazardous working conditions. The Entity verifies the age of candidates by checking identification cards and during the interview. There is no Child Labour or young Workers at the Entity. The youngest Worker on site was 19 years. The Entity communicates the requirement to the Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.
10.3a-c Forced Labour	Conformance	<p>The Entity has established and implemented a procedure on the prevention of involuntary labour, and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, Slavery and Human Trafficking. Based on Worker (included on-site accommodation Workers) interviews, management interviews and document review, employees are not required to provide any form of deposit; Recruitment Fee or advance at any stage of the employment. The Entity does not provide any form of loan to Workers. In the labour contracts signed between the Entity and Workers, no term of Debt Bondage is found. A review of the payslips of Workers confirm there are no illegal deductions.</p> <p>There is no restriction of Workers' freedom of movement at the site or on-site accommodation. Workers are free to leave the factory when not engaged in work. Workers move freely to access basic liberties (e.g., toilet, drinking water) and can access to external medical facilities as required. There are no foreign Migrant Workers at the Entity as all Workers are Chinese.</p> <p>The Entity has prepared a Modern Slavery Statement, which addresses Forced Labour, available at: https://www.ikd-china.com/web/pdf10/20.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established an anti-Discrimination procedure that effectively ensures equal opportunities, and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. The non-Discrimination policy is part of the training employees receive during onboarding and annual re-calibration training. Equal opportunities and non-Discrimination are evidenced via Worker interviews and results of the annual business conduct and conflict review process.
10.5 Communication and engagement	Conformance	The Entity has formulated and implemented an employee complaints management procedure. Measures including regular meetings between the Trade Union and senior management, the grievance and complaints hotline and email address, and relevant operating procedures act to ensure open communication and direct engagement with Workers and their representatives regarding

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		working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented and maintains a corporate Policy to prevent Harassment of any kind and Violence in the workplace. The Entity provides training on aspects of this Policy concerning the prevention of Harassment, and countering Harassment and Discrimination.</p> <p>The Entity's 'Ethics and Compliance Integrity Line' is available to all employees to anonymously report any cases of Violence and Harassment. The Policy is publicly available in the ASI Social, Environment, Governance Management Policy: https://www.ikd-china.com/web/pdf10/3.pdf</p>
10.7a-c Remuneration	Conformance	All remuneration payments are documented and promptly paid to Workers by bank transfer on the 10 th day of the month by bank transfer. Employees receive remuneration for working Overtime, on public holidays, on rest days and for evening shifts. Employees receive monthly payslips containing information on their wage rates, the calculation and deductions such as taxes. All employees are paid wages higher than the fixed living wage in China.
10.8a-c Working Time	Major Non-Conformance	<p>The Entity has implemented an attendance and working hours system. Working hours were confirmed based on the attendance record of 38 sampled employees over the previous 12 months (Nov 2023 to Oct 2024) and through Worker interviews. Working hours at the Entity cover two shifts. Overtime work is voluntary, and Workers can refuse any Overtime.</p> <p>However, monthly Overtime hours for selected Workers exceeded the statutory limit of 36 hours (maximum identified 184 hours), total weekly hours were over 60 hours (maximum identified 77 hours), and the consecutive working days exceeded 6 days (maximum identified 31 days).</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through local information systems including the employee handbook, electronic boards, public bulletin boards located in every workshop, trainings, personal consultations and meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has a valid ISO 45001:2018 certificate which is valid until October 2026. The Entity has established formal Policies for Occupational Health and Safety, which are posted in the internal public areas.</p> <p>However, based on onsite observations during the Audit, some chemicals (e.g., cutting liquor) did not have corresponding Material Safety Data Sheets (MSDS), and some Workers in the Polishing Workshop only wore disposable masks and not dust masks as required.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has a valid ISO 45001:2018 certificate. The Entity has included both OH&S performance indicators and comparative analyses of performance with peer Businesses and leading practice, in the Safety Work Report 2023, available at:

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		https://www.ikd-china.com/web/pdf/0/27.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established relevant OH&S procedures for OH&S-related controls. The mechanisms include Safety Committee meetings, suggestion box, and irregular Worker interviews. The Entity has maintained records since its establishment.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 April 2025	Initial Certification Audit – Provisional Certification