

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Zhejiang Daxia Aluminum Co., Ltd.

CERTIFICATE NUMBER
471

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

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

DATE OF ISSUE
27 MAY 2025

DATE OF EXPIRY
26 MAY 2028

CERTIFIED SINCE
27 MAY 2025

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'A' followed by a horizontal line.

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

Production of Aluminium alloy
profiles for shower rooms and
enclosures through key processes
including melting, pouring,
extrusion, polishing, cleaning, acid
washing and oxidation, cleaning
and spraying at Zhejiang Daxia
Aluminum Co., Ltd. located in
Zhejiang Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Zhejiang Daxia Aluminum Co., Ltd.
ENTITY NAME	Zhejiang Daxia Aluminum Co., Ltd.
CERTIFICATION SCOPE	Production of Aluminium alloy profiles for shower rooms and enclosures through key processes including melting, pouring, extrusion, polishing, cleaning, acid washing and oxidation, cleaning and spraying at Zhejiang Daxia Aluminum Co., Ltd. located in Zhejiang Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
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">13 – 14 February 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">29 April 2025
AUDIT SCOPE	<p>The Audit Scope included the production of Aluminium alloy profiles for shower rooms and enclosures at Zhejiang Daxia Aluminum Co., Ltd. located in Zhejiang Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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.

☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 27 May 2025 – 26 May 2028

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 27 May 2026

CERTIFICATE NUMBER 471



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

Zhejiang Daxia Aluminum Co., Ltd. (the 'Entity'), founded in 2014, is a wholly owned private enterprise located in Huzhou City, north of Zhejiang Province, China. It borders Suzhou City in the west of Jiangsu Province and Guangde City in the southeast of Anhui Province. The registered capital of the company is 7 million US dollars, with 72 employees and sales exceeding 100 million RMB.

The Entity mainly produces and sells Aluminium alloy profiles, including bright Aluminium alloy profiles and oxidized coloured Aluminium alloy profiles. Its processes include extrusion, polishing, oxidation, waste recycling and melting. The annual output is 8,000 tonnes, and the main product, shower rooms and enclosures Aluminium alloy profiles, is sold both domestically and internationally.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established the 'Social Responsibility Legal Regulations and Control Requirements Procedure', which stipulates the identification and evaluation of regulations led by the Entity's Administrative department. The Entity has hired a legal advisor and signed a 'Permanent Legal Advisor Agreement' to assist the Entity in providing legal information and training. The Compliance evaluation of environmental, health and safety (EHS) are the responsibility of the Administrative department. The Entity has a 'List and Evaluation of Laws, Regulations, and Other Requirements', which includes nearly 200 items such as health and safety, employee rights, chemical management, environmental protection, energy, finance, and taxation.
1.2 Anti-Corruption	Conformance	The Entity has established the 'Anti-Bribery and Anti-Corruption Control Procedure', which stipulates that in procurement, sales, and production activities, it must abide by the law and maintain integrity, including opposing Corruption. The Human Resources department is the leading department. The Entity has established a 'Gift Management System' and gifts exceeding defined amounts must be submitted. The main suppliers of the Entity sign the 'Supplier Anti-Commercial and Anti-Bribery Commitment', promising not to provide high consumption, gifts, or cash during the sales process. Key personnel in procurement, sales, outsourcing management, and other key positions of the Entity must sign the 'Anti-Bribery and Anti-Corruption Commitment Letter'.
1.3a-e Code of Conduct	Conformance	The Entity has established the 'Code of Conduct for Social Responsibility' which includes labour rights, health and safety, environmental protection, business ethics, and Management Systems. The Code of Conduct is revised every five years or when defects occur. The Code is available at: http://zjdxlv.com/nd.jsp?id=58&groupid=-1
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has established a Social Responsibility Policy signed by the chairman. The Policy includes compliance with regulations, respect for Human Rights, adherence to ASI requirements, and protection of the environment. The Policy will be evaluated every five years or when there are defects, and it has been publicly disclosed. However, the on-site interviews revealed that employees are not familiar with the Policy. Social Responsibility Policy: http://zjdxlv.com/nd.jsp?fromCollid=2&id=66#_np=2_332
2.2a-c Leadership	Conformance	The Entity provided a 'Letter of Appointment for Management Representative' and has appointed a Management Representative, whose responsibilities include ensuring the establishment and implementation of the ASI system and providing the necessary resources for implementation.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has established an Environmental Management System. The Entity has obtained an ISO 14001 certificate, however, a timely surveillance audit was not conducted, resulting in a suspended certificate.</p> <p>The Entity has established an Environmental Management Manual and procedures such as the 'Environmental Factor Identification and Evaluation Control Procedure', and the 'Environmental Operation Control Procedure'.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has established an Occupational Health and Safety Management System. The Entity has obtained an ISO 45001 certificate, however, a timely surveillance audit was not conducted, resulting in a suspended certificate.</p> <p>The Entity has established multiple social responsibility management procedures, including the 'Anti-Discrimination Control Procedure', 'Freedom Association Control Procedure', 'Female Employee Protection Control Procedure' and the 'Child Labor Relief Control Procedure'.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established the 'Suppliers Social Responsibility Control Procedure' and an 'Environmental, Social, and Governance (ESG) Procurement Policy'. The Policy covers ESG requirements and stipulates a review every five years or when there are defects. The Entity conducted a written ESG assessment of their supplier and requested the supplier to sign a 'Social Responsibility Commitment Letter'. The ESG Procurement Policy is publicly available at: http://zjdxlv.com/nd.jsp?id=68&groupid=-1</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>The Criterion is not applicable to the Entity, as there are no New Projects or plans to make significant changes to existing Facilities. The Entity has established a 'New, Reconstruction and Expansion Project Control Procedure', which requires Environmental and Social Impact Assessments to be conducted for New Projects.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>The Criterion is not applicable to the Entity, as there are no New Projects or plans to make significant changes to existing Facilities. The Entity has established a 'New, Construction and Expansion Project Control Procedure', which requires Environmental and Social Impact Assessment of new construction and expansion projects.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established the 'Emergency Preparedness and Response Control Procedure', which outlines the emergency procedures. The Entity has formulated the 'Emergency Plan for Sudden Environmental Incidents' and reported it to the local ecological and environmental protection bureau. The Emergency Plan includes emergency command team members, and comprehensive and special plans for Hazardous Waste pollution, hazardous chemical Leakage, fires, etc.</p> <p>The Entity has also established the '2024 Comprehensive Emergency Plan for Production Safety Accidents', which includes an emergency command group and an emergency response mechanism. The Emergency Plan includes multiple plans for multiple scenarios including fires, explosions, confined spaces, poisoning and suffocation, mechanical injury, and electric shocks.</p>

CRITERION	RATING	COMMENT
		<p>The Entity maintains records of emergency drills undertaken in 2024, including for firefighting, mechanical injury, Leakage, and electric shock.</p> <p>Emergency Plan for Sudden Environmental Incidents: http://zjdxlv.com/nd.jsp?fromCollId=2&id=62#_np=2_332</p> <p>Production Safety Emergency Plan: https://www.zjdxlv.com/nd.jsp?id=61&groupid=-1</p>
2.8a-d Suspended Operations	Conformance	The 'Merger, Acquisition, Closure, Retirement, Suspension, and Withdrawal Control Procedure' stipulates that during the suspension of operations, the Administrative department must manage EHS issues such as waste disposal, and Biodiversity. This department must communicate with employees or relevant parties. The Finance department is required to consider employee compensation.
2.9a-b Mergers and Acquisitions	Conformance	The 'Merger, Acquisition, Closure, Retirement, Suspension, and Withdrawal Control Procedure' stipulates that Due Diligence, internal and external environment analyses, and feasibility assessment must be conducted for mergers and acquisitions. The Entity currently has no plans for mergers or acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The 'Merger, Acquisition, Closure, Retirement, Suspension and Withdrawal Control Procedure' stipulates that asset liquidation, debt treatment, and personnel placements must be carried out during closure, retirement, or withdrawal activities. The Entity must evaluate whether remediation works are required. The Entity currently has no plans to close, retire, or divest.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has disclosed the '2023 Sustainability Report', which addresses topics including environment, Greenhouse Gas, Health and Safety, employee rights, supply chain management and governance philosophy, and details performance and results: http://zjdxlv.com/nd.jsp?id=69&groupid=-1</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has prepared a 'Corporate Credit Report', which confirmed it has received no violations or penalties. The Entity disclosed in the 2023 Sustainability Report (page 20) that there have been no violations in the past year: http://zjdxlv.com/nd.jsp?id=69&groupid=-1</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity's 2023 Sustainability Report (pages 21-22) includes information on payments made to the government, which are for taxes and fees only, without any other charges: http://zjdxlv.com/nd.jsp?id=69&groupid=-1</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented the 'Employee and Stakeholder Complaints and Control Procedure'. Employees can first file a complaint to the department head until it reaches the level of the General Manager for resolution. The program has the phone number and email address of the General Manager for internal and external appeals. The Entity provides quarterly employee representative meetings, with participants including management and workshop employee representatives, to address employee concerns.

CRITERION	RATING	COMMENT
		Employee and Stakeholder Complaint Control Procedure: http://zjdxlv.com/nd.jsp?id=65&groupid=-1
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Life Cycle Assessment (LCA) for one tonne of Aluminium alloy profiles using a cradle-to-gate approach.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	In the LCA Report, the types and quantities of raw materials used for one tonne of Aluminium were analysed, followed by an analysis of impact categories including GHG emissions, acidification, eutrophication, and non-biological resource consumption potential. The LCA Report includes life cycle analysis from cradle-to-gate, available at: http://zjdxlv.com/nd.jsp?id=70&groupid=-1
4.2 Product Design	Conformance	The Entity has a 'Design and Development Control Procedure', which requires environmental, and sustainability impacts to be considered as design input. The Entity has set a goal of increasing Aluminium recycling by 0.5% and reducing waste generation by 1%. The Entity has also set the goal of meeting environmental standards during the production process and ensuring labour safety.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has developed a 'Process Waste Recycling Plan'. The current main losses are from burning, during the production process, and non-compliant products. The Entity carried out process improvements in October 2024, resulting in a significant increase in the pass rate and a reduction in waste generation. In addition, the waste generated during the production process is recycled and reintroduced into production.</p> <p>At present, the Entity only purchases series 6 Aluminium bars as raw material. The head and tail waste generated after extrusion are separately stacked and remelted for use. Waste products collected from customers after sales are separately stacked, remelted, and made into products with lower technical requirements.</p>
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 'Scrap Product (Finished Product) Recycling Plan'. The Procurement department strives to increase the proportion of Recycled Aluminium to 20% over three years and maximise the recycling of scrap from customers.</p> <p>End of Life Product (finished product) recycling program: http://zjdxlv.com/nd.jsp?id=78&groupid=-1</p> <p>However, the Entity has not yet formulated and implemented a plan to collaborate with regional or nationwide recycling system to enhance the recycling and reuse of Aluminium.</p>

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has accounted for its Greenhouse Gas (GHG) emissions and disclosed a Third Party GHG Emissions Verification Report that addresses Scopes 1, 2, and 3: http://zjdxlv.com/nd.jsp?id=19&groupId=-1</p> <p>However, the Scope 3 data does not include GHG emissions data for Aluminium raw materials.</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 GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has formulated a Greenhouse Gases (GHG) Emissions Reduction Plan and established Intermediate Targets, available at: Gas Emissions Reduction Plan: http://zjdxlv.com/nd.jsp?id=20&groupId=-1</p> <p>Carbon Emission Reduction Targets: http://zjdxlv.com/nd.jsp?fromCollId=2&id=81#_np=2_332</p> <p>However, the GHG Emissions Reduction Plan does not have a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario using the ASI methodology.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has a management procedure that requires regular review of its GHG emissions reduction performance. The Entity has currently installed solar panels and energy storage systems on the roof. By 2025, the Entity aims to reduce emissions by 15% compared to 2020, 20% by 2030 and 30% by 2050.</p> <p>Gas Emissions Reduction Plan: http://zjdxlv.com/nd.jsp?id=20&groupId=-1</p> <p>Carbon Emission Reduction Targets: http://zjdxlv.com/nd.jsp?fromCollId=2&id=81#_np=2_332</p>
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has established the 'GHG Verification Comprehensive Control Procedure', which specifies the GHG implementation team, inventory methods, and calculation methods.</p> <p>However, the Entity's GHG Emissions Reduction Plan does not specify specific emission reduction methods.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>According to the Entity's Pollutant Discharge Permit, the Entity has eight major atmospheric pollutants including hydrogen chloride and chromic acid mist. The Entity conducts environmental monitoring annually. According to the monitoring report from April 2024, the detected values of all pollutants do not exceed the standards.</p>

CRITERION	RATING	COMMENT
		However, the on-site Audit found that the Entity has not quantified and publicly disclosed its major atmospheric emissions data nor formulated an emissions reduction plan.
6.2a-g Discharges to Waters	Minor Non-Conformance	<p>According to the Entity's Pollutant Discharge Permit and the on-site Audit, the main wastewater pollutants include nine categories such as total phosphorus and chemical oxygen demand. The monitoring reports from March and April 2024 indicate that pollutant levels are within the standards.</p> <p>The Entity uses potable water, and the production wastewater is primarily generated in the oxidation workshop. A sewage treatment facility has been established and wastewater that meets the standards is discharged into the municipal network. A sewage discharge monitoring system is connected to the local Ecological and Environment Bureau and an alarm notifies when pollutant levels exceed the standards.</p> <p>However, the Entity has not quantified and publicly disclosed the water pollutant emissions data, nor formulated an emissions reduction plan.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented the 'Emergency Plan for Sudden Environmental Incidents', evaluated the risks of Leakage and seepage, and developed on-site disposal plans for areas including the production workshop, hazardous chemicals workshop, sewage treatment station, and Hazardous Waste warehouse.</p> <p>The Entity has carried out drills of the Emergency Plan, simulating incidents such as the Leakage of pickling water and the Leakage in the Hazardous Waste warehouse, providing video materials and a summary report.</p> <p>The Environmental Emergency Plan is publicly disclosed at: http://www.zjdxlv.com/nd.jsp?id=62&groupid=-1</p> <p>Interviews and online searches confirmed that the Entity has not experienced any environmental incidents related to Leakage or seepage.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Through on-site interviews with personnel and online searches of public information and websites, confirmed there is no evidence of Leakage or related environmental incidents.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>On-site observations at the production workshop and Hazardous Waste warehouse, and referring to its Environmental Impact Report, the Entity has identified the types of Hazardous Waste and general solid Waste it generates. The Entity has disclosed the quantity of solid Waste generated and the treatment methods in the Waste Disclosure Report, available at: http://www.zjdxlv.com/nd.jsp?id=26&groupid=-1</p> <p>The Entity has collaborated with two qualified Hazardous Waste disposal companies, providing relevant agreements and qualification certificates. The Entity transfers Hazardous Waste irregularly and maintains clear records of Hazardous Waste transfers.</p> <p>However, the Audit revealed that the Entity did not design its waste management strategy in accordance with the Waste Mitigation Hierarchy and has no relevant implementation records. Moreover, the quantity of Hazardous Waste disclosed on the Entity's website does not match the actual transfer volume.</p>

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	Conformance	<p>The Entity has built a dedicated Hazardous Waste warehouse, with an independent area for storing Aluminium ash slag in packaging bags. The warehouse floor has been treated to prevent leaks and is equipped with catch basins to prevent the spread of Aluminium ash slag.</p> <p>The Entity has provided detailed records of Waste management and inventory of Aluminium ash slag. The on-site inspection shows that after the Aluminium slag is generated during the melting and Casting process it undergoes a treatment process to recover Aluminium. The Aluminium ash with an Aluminium content of 5%-10% is stored in the warehouse as Hazardous Waste. Aluminium is recovered from the Aluminium ash slag by the Hazardous Waste processor, and the remaining substances are specially treated and then used in the textile industry. Moreover, neither the Entity nor the supplier landfills the Aluminium ash slag.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity has assessed its water usage, and compiled a Water Resources Risk Assessment Report, available at: http://zjdxlv.com/nd.jsp?id=73&groupId=-1</p> <p>The Report indicates that the Entity does not use groundwater and mainly relies on municipal water supply. The assessment determined that the water resources risks are low.</p> <p>However, the Entity has not recorded or disclosed its water intake and usage according to the water sources and types for 2024.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Water Resources Risk Assessment Report concluded that water-related risks and the Entity's water resources management risk are low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has prepared a Biodiversity Risk Assessment Report which is publicly disclosed at: http://www.zjdxlv.com/nd.jsp?id=52&groupId=-1</p> <p>They have identified hazard sources from aspects such as pollution and species introduction. Through a comprehensive assessment of the probability of occurrence, degree of harm, and risk level, it was determined that the overall Biodiversity risk is low.</p>
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 identified Priority Ecosystem Services and the risks and potential impacts identified in its Biodiversity Assessment Report are all low risk.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risks and potential impacts are assessed and documented as low.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no identified Priority Ecosystem Services and the risks and potential impacts identified in its Biodiversity Assessment Report are all low risk.
8.4 Alien Species	Conformance	The Entity has assessed Alien Species in its Biodiversity Assessment Report, categorising them into intentional, unintentional, and natural introduction. They have identified the potential risks for each category and formulated corresponding measures. Currently, no Alien Species have been found around the Entity, and they are willing to cooperate with the local environmental management department to prevent the invasion of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	Through interviews and verification using map-based software, it was confirmed that there are no World Heritage Properties in the location of the Entity and its surrounding areas. The Entity has formulated a 'Letter of Commitment for The Protection of World Cultural Heritage' and has committed not to enter World Heritage Properties.
8.6a-d Protected Areas	Conformance	Through investigating map-based software and local government websites, it has been determined that the nearest nature reserve to the Entity is the Chinese Alligator Reserve, which is located approximately 7 kilometres from the Entity. Considering the location of the Entity, the operational activities of the Entity have relatively little influence on this nature reserve.
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	The Entity's Social Responsibility Policy addresses respect for Human Rights and gender equality, available at: http://zjdxlv.com/nd.jsp?fromCollId=2&id=66#_np=2_332 The Entity has developed the 'Social Responsibility Risk Identification, Evaluation and Control Procedure' to analyse and evaluate social responsibility risks. The Entity has provided a Due Diligence report on Human Rights, evaluating the level of risk in areas such as labour, health and safety, association, Discrimination, and anti-Corruption, as well as the current control status. The Entity has identified all suppliers, and employees as Stakeholders however, other relevant Stakeholders were not identified as a result the mapping of potentially Affected Populations and Organisations is incomplete.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established the 'Anti-Discrimination Control Procedure', which stipulates that employees must not be treated differently based on gender, age, or other factors, and there will be no Discrimination in recruitment, training, promotion, job allocation, or salary. Men and women receive equal pay for equal work and equal rights. The 'Female Employee Protection Procedure' requires the Entity to protect women's rights and interests. The Entity provided a performance report on

CRITERION	RATING	COMMENT
		<p>women's rights protection and gender equality, revealing that nearly half of the Entity's management personnel are women.</p> <p>The Entity has publicly disclosed the effectiveness of the measures taken to promote gender equity in their 'Women's Rights Protection and Gender Equality Performance Report', available at: http://zjdxlv.com/nd.jsp?id=23&groupid=-1</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable 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 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	There are no cultural and sacred heritage sites around the Entity, however, the Entity has developed a 'Commitment to Protect World Cultural Heritage Procedure' with a commitment not to enter and operate in World Heritage Properties.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned that have resulted in displacement or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed the 'Stakeholder Influence Control Procedure', which addresses communication and negotiation between various departments and Stakeholders, such as the Procurement department with suppliers, Sales with customers, and administrative offices with surrounding residents and is available at: http://zjdxlv.com/nd.jsp?id=57&groupid=-1</p> <p>The Entity conducted environmental impact monitoring in the previous year, and the result met emissions standards, The Entity had no impact on surrounding residents, and there were no complaints related to environmental protection. Approximately 25% of the employees come from the surrounding community.</p> <p>To support the community, the Entity has leased local land and developed lavender farm projects to increase farmers' income and to develop the local economy. The Audit team contacted the neighbourhood committee and did not receive any negative feedback on environmental protection or other aspects.</p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has established a Procurement Policy and 'Conflict Mineral Control Procedure', which stipulates that the Entity must not support or use raw materials from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has a 'Conflict Mineral Control Procedure' to control the purchasing process. The Entity has evaluated its supplier and communicated with them the requirement not to purchase raw materials from CAHRAs.</p> <p>All Aluminium material comes from a single supplier, and it was identified the risk is low. The supplier has signed a letter to not use conflict minerals.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, no actual or potential risks were identified. All raw Aluminium material for the Entity comes from a single supplier, and the main suppliers have signed a 'Conflict Mineral Non-Use Guarantee' commitment. All suppliers have committed not to use conflict minerals.
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	<p>The Entity provided a report on the investigation results of the supplier's Aluminium sources, stating that the raw Aluminium materials did not come from CAHRAs.</p> <p>Report on the findings regarding supplier Aluminium sourcing are available at: http://zjdxiv.com/nd.jsp?id=79&groupid=-1</p>
9.9 Security practice	Conformance	The Entity has a security management system, and the security personnel are its employees. The system stipulates that security personnel should respect employees and be responsible for the safety of physical property, register personnel's entry and exit, and conduct safety inspections.
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 the Entity complies with Applicable Law in China related to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	<p>The Entity has established the 'Freedom of Association Control Procedure' and the 'Employee Representative Control Procedure' to safeguard employees' rights to Freedom of Association. In 2023, the Entity established a Trade Union, and employees can join voluntarily.</p> <p>Meanwhile, the Entity has implemented the employee representative system. Nine employee representatives have been elected through the election process, and the Entity has provided the ballots for all workshop departments and the public announcement of employee representatives of the Second Trade Union Committee. According to the documents, employee representatives can exercise rights on behalf of employees and participate in the communication of various topics including Health and Safety.</p>

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	<p>The Entity has established the 'Child Labor Relief Control Procedure' and the 'Education Control Procedure for Juvenile Workers', prohibiting the use of Child Labour and standardising the remedial measures, which comply with local regulations.</p> <p>Upon checking the latest personnel roster, it was found that the youngest male and female Workers are of legal age. Through interviews and on-site inspections, it is confirmed that the Entity has not employed Child Labour or juvenile Workers and does not support the Worst forms of Child Labour.</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has established the 'Anti-Forced Labor Procedure' to ensure that employees are employed voluntarily, explicitly prohibiting Forced Labour and safeguarding personal freedom. Through on-site inspections and employee interviews, it has been verified that the Entity signs labour contracts directly with employees without the involvement of external companies. There are no unreasonable fees upon employment, no Debt Bondage, and employees enjoy freedom in both their work and personal lives. They can leave their jobs without any concerns, and there have been no incidents of Forced Labour.</p> <p>However, the Entity has not publicly disclosed a Modern Slavery Statement, nor has it explained the actions to address modern slavery issues.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established an 'Anti-Discrimination Control Procedure', which prohibits employees from being discriminated against during employment, including due to gender or race. It has also formulated the 'Female Employee Protection Control Procedure' to clarify the requirements for the protection of female employees.</p> <p>A sample of the payroll records confirmed that employees with the same job type and similar working times have salaries that are closely aligned with minimal variances. Employee interviews indicate that the working environment is viewed as inclusive and respectful, with no incidents of discriminatory behaviour reported.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established the 'Employee and Relevant Parties' Appeal Control Procedure' to standardise the information communication channels and management methods. The on-site Audit and interviews confirmed that the Entity has open communication channels such as WeChat, telephone, email, and suggestion boxes. Nine employee representatives can assist employees and represent their interests with the management. In addition, the contact information of management and responsible persons is publicly displayed on the announcement boards in the factory area and workshops. Employees are aware of these contact methods and do not fear retaliation.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has recently established an 'Anti-Harassment Control Procedure', prohibiting all forms of Violence and Harassment in the workplace, and posted relevant guidelines in the workshop and on the notice boards. Through the on-site Audit and employee interviews, it has been found that no such incidents have occurred at the Entity, and employees have not witnessed such incidents either.</p> <p>The Entity has processes in place to conduct a unified review of all ASI-related Policies annually to ensure their applicability and effectiveness.</p>

CRITERION	RATING	COMMENT
		<p>The Social Responsibility Policy, which addresses Violence and Harassment, is available at: http://www.zjdxiv.com/nd.jsp?fromColId=104&id=66#_np=104_356</p>
10.7a-c Remuneration	Minor Non-Conformance	<p>The employment terms are specified in Chinese in labour contracts. The local minimum wage standard is 2,260 yuan, and employees' actual earnings exceed this standard, sufficient to meet their basic living needs with some surplus.</p> <p>The Entity standardises Overtime pay through the 'Wage and Bonus Calculation Method'. For employees on the hourly wage system, Overtime pay is calculated at 1.5 times, 2 times and 3 times the normal wage respectively for working days, weekends and holidays, which is consistent with employee feedback.</p> <p>The Entity pays the salaries of the previous month by bank transfer in the following month. In case of holidays, the payment will be made in advance. Payslips and bank statements were evidenced during the Audit. The social security contributions for the Entity's current employees comply with relevant regulations, and relevant documents are available for inspection.</p> <p>However, the Audit identified non-compliance issues regarding the payment of wages on rest days and holidays for some piece-rate positions in the extrusion workshop.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity enforces an eight-hour standard working system as stipulated in the 'Working Time Management System'. Office staff are entitled to compensatory time off for Overtime, while frontline employees are paid for Overtime. Through inspection, it was confirmed that the monthly Overtime of most employees complies with regulations, with at least one day off every six days.</p> <p>However, the weekly working hours of some positions in the extrusion workshop exceed the standard.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their rights by establishing ASI-related Policies and publicly disclosing their content. Employees are made aware that their rights and interests are safeguarded. Additionally, the Entity has implemented an employee representative system. Representatives are elected by front-line employees to protect collective interests and assist with relevant matters. Employees are well informed about the candidates for these representative positions and the methods available to safeguard their rights.</p>
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 45001:2018 certified Occupational Health and Safety (OH&S) Management System and developed related management documents including manuals and procedure documents. The ISO certification is currently suspended as the required surveillance audit was not undertaken as scheduled.</p> <p>However, the on-site Audit identified occupational disease hazards in the Entity's workshop, inadequate hazard signage, inadequate use of personnel protective equipment, and fire-related equipment was missing.</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has evaluated the risks related to OH&S through the internal audit and management review processes.</p> <p>However, the Entity has not publicly disclosed the performance of the OH&S Management System, has not analysed OH&S indicators, nor made comparisons with the practices of peers and leading benchmarks.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity's OH&S Management System covers all departments and employees. The OH&S performance indicators apply to all employees, and the effectiveness of the system is evaluated through these indicators.</p> <p>The Entity has established a Trade Union and employee representatives to assist in handling matters related to the core interests of employees. It also provides various communication channels such as suggestion boxes and emails to facilitate employees' participation in OH&S.</p> <p>Interviews confirmed that employees are aware of the Entity's health and safety regulations and the channels for making complaints. They are willing to use these channels and have no fear of retaliation.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	27 May 2025	Initial Certification Audit - Full Certification