
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SHANGHAI HUAFON ALUMINIUM CORPORATION

CERTIFICATE
NUMBER

310

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SHANGHAI KYLIN
CERTIFICATION
SERVICE CO.,
LTD.

DATE OF ISSUE

23 OCTOBER 2023

DATE OF EXPIRY

22 OCTOBER 2026

CERTIFIED SINCE

23 OCTOBER 2023

AUTHORISED BY

A stylized signature in black ink, likely representing the Aluminium Stewardship Initiative Ltd.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Shanghai Huafon Aluminium Corporation in Jinshan District Shanghai, China. Major products include Aluminium alloy strip, foil, sheet and stamping parts. The main manufacturing processes include casting, hot-rolling, cold-rolling, slitting and stamping.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Shanghai Huafon Aluminium Corporation
ENTITY NAME	Shanghai Huafon Aluminium Corporation
CERTIFICATION SCOPE	Shanghai Huafon Aluminium Corporation in Jinshan District Shanghai, China. Major products include Aluminium alloy strip, foil, sheet and stamping parts. The main manufacturing processes include casting, hot-rolling, cold-rolling, slitting and stamping.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (15 – 17 May 2023)• Surveillance Audit (17 – 18 April 2025)
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 15 – 17 May 2023 (Initial Certification Audit)• 17 – 18 April 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 14 July 2023 (Initial Certification Audit)• 26 June 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (15 17 May 2023)</u></p> <p>The Audit Scope included the Shanghai Huafon Aluminium Corporation in Jinshan District Shanghai, China with the major products including various series of Aluminium alloy strip, foil, sheet and stamping parts and the main manufacturing processes of casting, hot-rolling, cold-rolling, slitting and stamping.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (17 – 18 April 2025)

The Audit Scope included the Shanghai Huafon Aluminium Corporation in Jinshan District Shanghai, China with the major products including various series of Aluminium alloy strip, foil, sheet and stamping parts and the main manufacturing processes of casting, hot-rolling, cold-rolling, slitting and stamping.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

23 October 2023 – 22 October 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

22 October 2026

CERTIFICATE
NUMBER

310

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Compliance Management Procedure and the Planning Department is responsible for annual compliance evaluations. The Entity maintains a list of Applicable Law relating to Environment, Health and Safety (EHS), labour, finance and taxation. The compliance evaluations were provided.
1.2 Anti-Corruption	Conformance	The Entity has established the Anti-Corruption and Bribery Control Procedure, Advertising and Fair-Trading Procedure, and Business Ethics Control Procedure. An anti-Corruption organisational structure, led by the General Manager, has been established that includes the Environment, Health and Safety (EHS), Quality, and Comprehensive Management Departments.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct, which includes guidelines related to corporate governance, social responsibility and the environment: http://www.huafonal.com/upload/asi/xwzz.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established and implemented Policies on EHS, social responsibility, governance, and responsible procurement. The Entity has ISO 14001 and ISO 45001 certifications.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The General Manager has approved the various Environmental, Social and Governance (ESG) Policies. The management review concluded that the various Policies are appropriate.
2.1c Environmental, Social, and Governance Policy (communication)	Minor Non-Conformance	The Policies are published on the Entity's website and communicated internally: http://www.huafonal.com/upload/asi/ASlzl.pdf However, during the Audit it was identified that some Workers were unaware of the ESG Policies.
2.2 Leadership	Conformance	The Entity has appointed two management personnel, the Assistant General Manager and Quality Department Head, as the ASI Management Representatives. The Management Representatives are responsible for the ASI system implementation and maintenance, as well as internal and external system liaison issues.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an established ISO 14001 Environmental Management System and holds a valid certification.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established a Social Management System that is ISO 45001 certified (valid until July 2023). The Entity has also established a number of management procedures for social management to address the protection of women and pregnant workers, young workers, human rights and labour rights.</p> <p>The Entity has established a Social Management System including a number of social management Policies and procedures related to anti-Corruption, anti-Discrimination, women's labour protection, underage Workers, Human Rights investigation and control, communication management, and Due Diligence processes for Child Labour and Forced Labour. The Entity holds a valid ISO 45001 certification.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has established a responsible procurement Policy that addresses environment, social and governance issues.</p> <p>The Entity has communicated its Responsible Procurement Policy to suppliers who have signed the Policy.</p>
2.5 Impact Assessments	Conformance	<p>There have been no New Projects or Major Changes at the Entity in the past year. However, if a New Project is approved, the Entity would implement the Impact Control Procedure for New Projects, which requires the Entity to conduct environmental, Human Rights, cultural, and Social Impact Assessments.</p> <p>The Entity has established a New Project Impact Control Procedure. Since the previous Audit, the Entity has established a new workshop (slag project and stamping equipment), and the associated Environmental Impact Assessment has been approved by the local environmental protection department. The new workshop is located within the factory area, with basic internal staff deployment and no significant social impacts.</p>
2.6 Emergency Response Plan	Conformance	The Entity has established an Environmental Emergency Plan, Production Safety Accident Emergency Plan, and Leakage Risk Assessment. Emergency drill plans address fire prevention, chemical leakage, heatstroke, liquid nitrogen leakage and explosion, and train failures in the casting workshop, and drills have been conducted.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Mergers and Acquisitions Management Regulation, and Due Diligence processes required in the management of mergers and acquisitions address ESG aspects. There are currently no cases of mergers or acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a Management of Closure, Retirement, and Divestment Regulation, which requires the consideration of environmental, social, economic, and governance factors during the process. There is no planned closure, decommissioning or divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has prepared an annual Sustainable Development Report, which addresses ESG topics including environment, safety, labour, finance and taxation and compliance. At the time of the Audit, the Entity's 2024 Report was in development. The Entity's 2023 Sustainable Development Report is available at: http://www.huafonal.com/upload/asi/2022cxzfzbb.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity's 2023 Sustainable Development Report confirms that there have been no violations. According to the government enterprise credit disclosure website, no violation was found.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's 2023 Sustainable Development Report confirms that only taxes and social security fees were paid, and there are no other payments made to the government: http://www.huafonal.com/upload/asi/2022cxzfzbb.pdf
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Minor Non-Conformance	The Entity has established the Employee Appeal and Complaint Handling Control Procedure, which provides for employee complaints and appeals. The cafeteria has an anonymous reporting mailbox, which is regularly opened and inspected by the Comprehensive Management Department. In addition, contact details are provided in the employee handbook. In 2023, 392 recommendations were adopted, including eight for the humanities area (team building, women's restroom capacity, and optimising meal exchange procedures) and 84 for safety and fire protection. The Procedure for Handling Stakeholder Complaints and Grievances stipulates that the HSE Department is responsible for receiving appeals and complaints.

CRITERION	RATING	COMMENT
		The Entity has established a Stakeholder Complaint and Appeal Handling Procedure. The Comprehensive Management Department is responsible for summarising various suggestions, and the HSE Department for receiving complaints and appeals. However, the employee suggestion box is no longer operational and the complaints hotline is managed by the front desk switchboard. Additionally, the internal and external complaints hotline, email and other communication channels have not been updated in a timely manner.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity selected a one tonne AA1050 Aluminium sheet for the Life Cycle Assessment (LCA). The LCA report has been published, which addresses environmental impacts including acidification, climate and more.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA information includes a cradle-to-gate approach.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's LCA is available on the Entity's website: http://www.huafonal.com/upload/asi/AA1050.pdf
4.2 Product design	Conformance	The Entity has an Impact of Product Design work instruction that requires the Technical Department and quality process personnel to consider material conservation, energy consumption, environmental and cultural considerations in Product design. The Entity has established a defect improvement project team to carry out technical improvements and improve the yield rate. The number of defects has slightly decreased compared to the previous year.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's Management Measures for Waste Recycling Process establishes a target for the utilisation of Aluminium Process Scrap. The Entity calculates the utilisation rate annually and strives to improve it in the following year.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Aluminium Process Scrap generated during the production process is recorded in proportion to its composition and stored in the warehouse. The warehouse selects waste and raw Aluminium that match the alloy ratio of the production task and then produces them out of the warehouse. The Aluminium Process Scrap generated during the production process is collected according to the production task and brand. The Warehouse

CRITERION	RATING	COMMENT
		Department selects the Scrap materials and Primary Aluminium that match the alloy ratio of the Product and releases them to the Production Department. The remaining part is provided to the supplier for processing or sold for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	The Entity has established the requirements for the purchase and use of external recycled products, which specify the proportion of different alloys and internal and external waste materials that can be used. However, the Entity has not yet implemented a clear recycling strategy that includes specific timelines, activities and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has established a plan to increase the proportion of external waste products from a small number of customers.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has implemented an energy Management System that is ISO 50001 certified. The Entity's Scope 1 and 2 Greenhouse Gas (GHG) emissions and energy data for 2023 are publicly disclosed on the company's website: http://www.huafonal.com/upload/asi/2022wsjh.pdf
5.2 GHG emissions reductions	Conformance	The Entity has reduced its GHG emissions by sourcing hydroelectricity, establishing rooftop solar power generation equipment and technological upgrades. The Entity has publicly disclosed the 2024 Greenhouse Gas Emissions Target and Implementation Plan, which aims to reduce energy consumption by renovating outdated motors, installing frequency converters on refrigeration machines, and retrofitting servo motors in hydraulic pump stations. The Greenhouse Gas Emission Targets and Implementation Plan is available at: http://www.huafonal.com/upload/asi/2023wsjh.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented total volume control over atmospheric pollutant emissions and obtained a

CRITERION	RATING	COMMENT
		<p>pollutant discharge permit. The Entity monitors the exhaust emissions annually and the test results meet the standards. Melting is the main process that generates exhaust gas and detection equipment for monitoring exhaust gas emissions is connected to the government's environmental protection department. The Entity has formulated emission reduction plans for exhaust gas in 2024 and 2025, and the actual emission reduction of exhaust gas in 2024 exceeds 20%.</p>
6.2 Discharges to Water	Conformance	<p>The Entity discharges domestic sewage into the sewage treatment plant. During the production process, water is recycled and not discharged. Domestic sewage is tested annually and currently meets the required standards.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has developed an Environmental Emergency Risk Assessment Report, which assessed the potential for Spills and Leakages. The Entity has undertaken a scenario analysis of potential Leakage risks associated with the use and storage of chemicals and oils.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has developed an Environmental Emergency Plan and Emergency Plan for Production Safety Accidents, and has established environmental and safety emergency response procedures for Spills and Leakage.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has established a Leakage Risk Assessment Report that requires regular disclosure and improvement of emergency response capabilities. There have been no Spills or Leakages at the Entity in recent years.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has prepared a Leakage Risk Assessment Report. There have been no leakage incidents since the last Audit.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has established operational instructions for the treatment of Non-Hazardous Waste (solid) and Hazardous Waste (solid) and developed appropriate disposal measures according to the type of waste. The collection, classification, utilisation or sale of various wastes, such as cutting waste and aluminium slag are defined and the recycling and disposal of Hazardous Wastes are clarified.</p> <p>The Entity has established a Waste Management Strategy to differentiate and manage solid, Hazardous and household Wastes. The requirement for Non-Hazardous Waste is to improve resource utilisation and reduce generation. The requirement for Hazardous</p>

CRITERION	RATING	COMMENT
		Waste is to dispose of it in accordance with the regulatory requirements during production, storage, and transfer processes. Hazardous Waste is sent to qualified contractors for appropriate disposal.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has disclosed the quantity of Hazardous and Non-Hazardous Waste in the 2024 Solid Waste Management Information Disclosure: http://www.huafonal.com/upload/asi/2024gfbb.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity has established an Aluminium Ash Treatment Plan. After the slag is heat treated by the Entity, it is sent to qualified Hazardous Waste units for disposal.
6.8b Dross (recycling)	Conformance	The Entity has recently commissioned slag roasting equipment, which reduces the Aluminium content in the slag before it is sent to qualified processors for disposal.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	The Entity's Aluminium ash is sent to qualified Hazardous Waste processors together with the necessary Waste transfer form for processing.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has established a water conservation programme and conducts an annual inventory of water usage, which is sourced from the municipal supply. The main use is for domestic water and industrial water recycling.
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has developed a Water Resources Risk Assessment Report based on its water use, which considered the ratio of the average daily consumption to local water supply capacity and water-related risks were considered low.</p> <p>The Entity has prepared a Water Resource Risk Assessment Report, which concludes that water consumption compared to the output of the water plant is low. The assessment of the impact of water usage on the Watershed is low risk.</p>
7.2a Water management (management plans)	Conformance	Although water-related risks are considered low, the Entity has established a Water Use Plan, and has identified management actions to address the aging infrastructure (pipes) and the potential leakage of underground reservoirs.
7.2b Water management (monitoring)	Conformance	The Entity has developed a construction schedule for a pipe replacement project to replace the aging water pipes, which is currently under construction.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has disclosed its Water Resources Risk Assessment Report, which includes information on water sources and use:</p> <p>http://www.huafonal.com/upload/asi/szyfxbb.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a Biodiversity risk assessment and prepared a Biodiversity Report. Since the last Audit, there has been no significant change in the surrounding environment. The report identified potential factors that may affect Biodiversity, including wastewater, exhaust gases, noise, and unintentional or natural introduction of Alien Species. The Entity has assessed the risks of potential impacts on Biodiversity caused by various factors, and the Entity's impact on local Biodiversity is considered low.

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment determined that potential impacts are low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment determined that potential impacts are low.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment determined that potential impacts are low.
8.3 Alien Species	Conformance	The Entity's Biodiversity assessment considered the potential risk of the introduction of Alien Species and the Entity has implemented risk control methods associated with the wooden pallets used.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has implemented a Social Responsibility Policy that includes a commitment to respect Human Rights and strict adherence to regulations and international conventions. The Entity's Code of Conduct addresses and requires the respect of Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Investigation Control Procedure, which specifies the Human Rights investigation process. The report on the investigation is available at: http://www.huafonal.com/upload/asi/2022rqdcbb.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a Human Rights Due Diligence process, which has not identified any adverse effects on Human Rights. No remedial action is currently required.
9.2 Women's Rights	Conformance	The Entity has implemented a Women's Labour Protection Policy that addresses the protection of the rights and interests of female employees. The Anti-

CRITERION	RATING	COMMENT
		Discrimination Control Procedure addresses protection against Discrimination during promotion, training, and other stages of employment. The Entity currently employs women in executive and senior management roles.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The Entity is located in an industrial area with the nearest residential area approximately two kilometres away. No complaints from the Local Community have been recorded.
9.7b Local Communities (impacts)	Conformance	The Entity addresses potential environmental issues through the implementation of an EHS Management System and meets environmental standards for emissions and has no substantial impact on surrounding residents in terms of water and electricity usage.
9.7c Local Communities (livelihoods)	Conformance	The proportion of Workers employed by the Entity from the Local Community is approximately 60%. The Entity has recently been awarded the local government's '2024 Outstanding Enterprise Social Welfare Award'.
9.8 Conflict-Affected and High-Risk Areas	Minor Non-Conformance	The Entity has established the Management of Conflict Minerals Investigation Regulations, to investigate the source of metals, including Aluminium, copper, zinc, and manganese, in its supply chain. The Entity has a risk assessment process and has undertaken an assessment for a major Aluminium ingot supplier, which determined that the Aluminium source is not a high-risk area. However, the risk assessment was not undertaken for all Aluminium suppliers.
9.9 Security practice	Conformance	The Entity has established a Security Management Procedure and security personnel are mainly responsible for registering entry and exit movements to

CRITERION	RATING	COMMENT
		the factory and inspection of goods at the gate. The restriction to personal freedom, confiscation of documents, oppression of Workers, and other Human Rights violations by security personnel are prohibited.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China regarding the Freedom of Association and the right to Collective Bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China regarding the Freedom of Association and the right to Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports employees in electing their own representatives, whose role is to communicate with management on various matters. Employee representatives are elected every five years. The Entity has established a Union Constitution and holds an annual employee representative meeting to discuss employee-related issues.
10.2a Child Labour (minimum age)	Conformance	The Entity's youngest employee is 21 years of age, and no evidence or instances of Child Labour were identified during the Audit.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a Control Procedure for Prohibiting the Use of Child Labour, which states that the Entity shall not employ Workers under the age of 16. The Procedure requires the Human Resources department to identify the true age of employees during the recruitment process.
10.2c Child Labour (worst forms)	Conformance	The Entity prohibits the use of Child Labour and commits not to use or support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits Human Trafficking. The Entity recruits employees through standard recruitment practices or employee referrals.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits any direct or indirect payment of Recruitment Fees or other unreasonable fees by Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits

CRITERION	RATING	COMMENT
		the collection of deposits or security deposits from Migrant Workers.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits any form of Debt Bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits the restriction of Workers' reasonable freedom of movement in the workplace or residence. Worker interviews confirmed that freedom of movement was not restricted.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits the Entity from retaining employees' original identification documents. The Entity currently only retains copies of identification or certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established the Prohibition of Use of Forced Labour Management Procedure that prohibits the Entity from restricting the normal resignation process. Worker interviews confirmed the freedom to terminate their employment.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Control Procedure, which requires the Entity not to Discriminate on any grounds including gender, race, religion, or other factors, in recruitment, promotion, salary, training, dismissal, and other matters. No Discrimination incidents were found during Worker interviews.
10.5 Communication and engagement	Conformance	The Entity has established a Communication Management Control Procedure, which prohibits retaliation against employees for communicating concerns. Employees usually seek help from their supervisors to solve issues, or communicate through annual employee communication meetings or employee representatives. Employees can also communicate with the Entity's management through the internal Feishu system.
10.6 Disciplinary practices	Conformance	The Entity has established a Management of Disciplinary Measures Procedure, which requires the Entity to only take disciplinary measures allowed by regulations. Physical punishment, intimidation, or verbal abuse of employees that involves mental or physical abuse is prohibited.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Entity primarily implements a time-based wage system, and the minimum wage and social security base comply with the regulatory requirements. According to regulatory requirements, the Entity pays social security and calculates employee Overtime pay. A randomised review of salary payments over three months in 2024, demonstrated that the Entity complies with regulatory requirements.
10.7b Remuneration (method of payment)	Conformance	Workers' remuneration is paid by bank transfer on the 15th of each month. Contract labour employees are paid by the labour outsourcing company on the 25th of each month. No arrears or delays in payment are found.
10.8 Working Time	Minor Non-Conformance	The Entity's office personnel generally work 40 hours per week, with occasional Overtime. Production Workers in the workshop work shifts. However, the Entity does not calculate annual leave according to the cumulative length of service as required by regulations, rather it is calculated based on the length of service upon entering the Entity's employ. The Entity has applied for a 'comprehensive working hours system' with the local labour bureau. However, the casting workshop and security department have implemented a shift system and Overtime hours exceed the monthly limit of 36 hours as per regulations.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an ISO 45001 certified Occupational Health and Safety (OH&S) Management System including an OH&S Policy that has been approved by the General Manager.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Employees and Visitors entering the factory area are required to comply with the Entity's OH&S Policy. First-time Visitors undergo a site induction to understand the safety requirements. It was confirmed during the audit that a supplier installing equipment on-site had signed the safety notice, and the construction safety certificate had been inspected by the Entity.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's OH&S Policy includes a commitment to ensuring the health and safety of employees including the right to stop unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has established an ISO 45001 certified OH&S Management System. The scope of the OH&S Management System covers the entire Entity, including the identification and compliance with Applicable Law.
11.3 Employee engagement on health and safety	Conformance	The Entity has established various mechanisms for employee engagement on health and safety including having part-time Safety Officers in each workshop, a safety inspection system and an OH&S Committee that includes management and Workers across all areas. The Entity has an intelligent security and environmental protection system, and employees can provide monthly feedback on security risks through the PDA (personal digital assistant) configured on each machine.
11.4 OH&S performance	Conformance	In accordance with the requirements of the Management System, the Entity has established target indicators and a management plan to evaluate Occupational Health and Safety performance. The results of the Entity's 2022 target indicators and management plan were all achieved. The Entity has established OH&S goals and indicators and implemented graded management for accidents. Since the previous Audit, no major safety accidents have occurred, no occupational disease cases have been found, and the OH&S target has been achieved. The Entity regularly holds safety meetings to evaluate the achievement of goals and discuss preventative measures.

Document Control and Version History

Revision	Date	Notes
0	23 October 2023	Initial Certification Audit – Full Certification
1	15 July 2025	Surveillance Audit