

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Cromodora Wheels S.p.A (Italy)

CERTIFICATE  
NUMBER

493

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

DATE OF ISSUE

18 SEPTEMBER 2025

CERTIFICATION LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

31 MAY 2027

ASI ACCREDITED  
AUDITING FIRM

TÜV RHEINLAND  
CERT GmbH

CERTIFIED SINCE

18 SEPTEMBER 2025

## AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. Hall'.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Design, manufacturing and  
distribution of light alloy wheels at  
Cromodora Wheels Facility in  
Brescia, Italy.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Cromodora Wheels
ENTITY NAME	Cromodora Wheels S.p.A (Italy)
CERTIFICATION SCOPE	Design, manufacturing and distribution of light alloy wheels at Cromodora Wheels Facility in Brescia, Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion – Principles 1 to 4 (transition)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>15 – 17 July 2025</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>30 July 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope covered the design, manufacturing and distribution of light alloy wheels at Cromodora Wheels Facility in Brescia, Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion – Principles 1 to 4 (transition)</li></ul> <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	18 September 2025 – 31 May 2027
NEXT AUDIT TYPE	Surveillance Audit

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NEXT AUDIT DATE	31 May 2027
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CERTIFICATE NUMBER	493
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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.

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## ENTITY OVERVIEW

Cromodora Wheels S.p.A (Italy) (the ‘Entity’) commenced operation in 1975, and is located in Ghedi, Brescia, Italy. The Entity’s plant area is composed of five main departments: 1. Production (foundry, machining, painting, and final inspection); 2. Logistics; 3. Technical Department; 4. Quality; and 5. Financial Division. The Entity’s other facilities include, administrative offices, first aid, maintenance, equipment and supply storage, workshop, laboratory and fuel and chemical storage, as well as a treatment plant. The Facility covers an area of approximately 60,000 square metres (m<sup>2</sup>). The main integrated building where production and administration are located is approximately 31,500 m<sup>2</sup>. The Entity currently employs approximately 500 people.

The main activities undertaken include the design, production, and distribution of light alloy wheels. Main processes include melting, casting, flow forming, heat treatment, machining, diamond turning, deburring, painting and final inspection. In 2024, the Facility produced close to 1.5 million wheels. The Entity is working as a co-design partner with Original Equipment Manufacturers (OEM) including Audi, Porsche, BMW, Mercedes, Ferrari, Land Rover, Volkswagen, Skoda, Seat and Stellantis.

The nearest township to the facility is Ghedi, located approximately six kilometres (KM) from the Facility, and nearby sensitive receptors include the Garda Lake (approximately 22 km east of the Entity). Key external Stakeholders include the Government of Brescia and the environmental protection regional agency (ARPA), for H&S, the Agency of Health and Safety (ATS), the local town of Ghedi City, local NGOs including the Red Cross of Ghedi, among others.

The Entity has been an ASI Member in the Industrial Users membership class since December 2023.

## 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
<b>SYSTEMS</b>	Medium	Medium	High	MEDIUM
<b>RISKS</b>	Medium	Medium	High	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	High	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established, implemented, and maintains a Management System related to its main Policies. As a component of the Management System, the Facility maintains a legal matrix register that identifies the applicable regulatory framework related to Environmental, Social, and Governance (ESG) dimensions.</p> <p>The Entity has also established a procedure as a part of its Organisation, Management and Control Model, as well as a detailed annex. This procedure aligns with local legislation concerning Human Rights, Labour Rights, and anti-Discrimination, as well as laws addressing Corruption, public administration, financial crimes, cybercrime, contraband, and corporate crimes. The Entity has also implemented a procedure for managing changes, which includes monitoring related to changes in Applicable Laws and communicating changes to all departments involved.</p> <p>The Entity holds external certification related to Environmental Compliance at the National, regional, and local levels and is audited by the Environmental Authority and the Labour Authority.</p> <p>Internal audits are conducted annually in accordance with its annual audit plan. In addition, the Entity's supervisory body conducted a full compliance review on 31 January 2025, which identified no non-compliance.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Code of Ethics, which includes the prohibition of Bribery in all Business practices and transactions. The Code of Ethics is posted on billboards and disclosed on the Entity's website, and is accessible at: <a href="https://www.cromodorawheels.com/wp-content/uploads/2023/03/codice-etico_ENG_3.pdf">https://www.cromodorawheels.com/wp-content/uploads/2023/03/codice-etico_ENG_3.pdf</a></p> <p>The Entity also has implemented a procedure as part of its Organisation, Management and Control Model, along with a detailed annex. This procedure aligns with local legislation concerning Human Rights, Labour Rights, and anti-Discrimination, as well as laws addressing Corruption, public administration, financial crimes, cybercrime, contraband, and corporate crimes, as well as processes related to physical security. According to this procedure, no cash transactions are allowed.</p> <p>The Entity has conducted risk assessments related to their activities, as well as those of its suppliers and customers. Personnel are trained in Bribery risk according to training registers. There is a control System in place to ensure accurate reporting and adequate control coverage of all the Entity's activities, with particular attention to areas deemed potentially at risk.</p> <p>The Entity has established a body responsible for reviewing the Entity's anti-Corruption performance, as well as an annual financial audit performed by a globally recognised financial audit company.</p> <p>The Entity has implemented a whistleblowing procedure that includes investigating Bribery and is managed by an external service. There have been no Bribery incidents reported within the previous twelve months.</p> <p>The 2024 Sustainability Report includes an indicator of Bribery incidents which is accessible at:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf">https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf</a>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Ethics which includes principles relevant to environmental, social, and governance performance. The Code of Ethics is posted on billboards and disclosed at: <a href="https://www.cromodorawheels.com/wp-content/uploads/2023/03/codice-etico_ENG_3.pdf">https://www.cromodorawheels.com/wp-content/uploads/2023/03/codice-etico_ENG_3.pdf</a></p> <p>The Entity has implemented a Purchasing Policy that includes compliance with its Code of Ethics. The Entity also conducts Due Diligence processes and only engages with ASI Certified suppliers. All personnel receive training on the Code of Conduct as confirmed via the training registers.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established a Quality, Environment, Energy, and Information Security Policy. Senior management has endorsed this Policy, which is available at: <a href="https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-_Rev_F.pdf">https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-_Rev_F.pdf</a></p> <p>The Entity has implemented a Management System General Control Procedure and a Policy that guides its operations, available at: <a href="https://www.cromodorawheels.com/storage/2023/06/2023_Modello-di-organizzazione-gestione-e-controllo-parte-generale-01.pdf">https://www.cromodorawheels.com/storage/2023/06/2023_Modello-di-organizzazione-gestione-e-controllo-parte-generale-01.pdf</a></p> <p>Performance is evaluated internally and externally, with internal and external audits related to certification schemes including ISO 14001.</p> <p>Additionally, the Entity has established a procedure 'Norms of behaviour for Workers' that includes Labour and Health and Safety Policies. The communication of main Policies is facilitated via emails, posters on billboards on-site and on the Entity's website: <a href="https://www.cromodorawheels.com">https://www.cromodorawheels.com</a></p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed a Management Representative for the ASI Performance Standard and has provided ASI training to relevant employees. The Entity has implemented a procedure for annual ESG Management Revision, where relevant Policies are evaluated and key indicators are followed.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has established documented management systems that address environmental and social dimensions, comprising of Environmental and Social Policies, procedures, and records. The Quality, Environment and Information Policy is endorsed by senior management and is accessible at: <a href="https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-_Rev_F.pdf">https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-_Rev_F.pdf</a></p> <p>An analysis of the environmental and social context, along with Stakeholder input, has been conducted, including risk identification and Impact Assessment. This analysis is reviewed annually. Workers receive training and are made aware of the Management System.</p> <p>The effectiveness of the Management System is verified through both internal and external audits, and the Facility is ISO 14001 certified.</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has defined the social framework in documents related to the Human Resources Management procedure and the Rules of Conduct. A risk evaluation related to labour risks was conducted, and the Entity has implemented actions to mitigate the risks.</p> <p>The internal audit department is responsible for ensuring the effectiveness of the Policies and procedures.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Purchasing Policy that includes compliance with the Code of Ethics. A Supplier Qualification and Evaluation Procedure has been implemented for Due Diligence processes, and the Entity only engages with ASI Certified suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facilities.</p> <p>The Entity is ISO 14001 certified and is in the process of becoming ISO 50001 certified to ensure their Environmental and Social Impact Management Plan is revised annually.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facilities.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed and implemented an Emergency Response Plan (ERP), which is revised annually, with the last revision undertaken in October 2024. The Entity has communicated the ERP to the local authorities for its review and approval. Training is provided to all Workers on the Health and Safety Policy and procedures.</p> <p>The Entity has implemented appropriate emergency response equipment (e.g. fire extinguishers, hydrants, and alarm system) and monitors these regularly. Emergency drills addressing all occupants on-site for all shifts are conducted at least annually. There is a first aid room with a doctor who performs monthly health assessments of Workers.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Business Continuity Contingency Plan Procedure based on ISO 22301:2019 to address situations where it may have to suspend or significantly alter its operations due to factors outside its control. The risk analysis and mitigation measures are reviewed annually. The last revision of the Business Continuity Contingency Plan Procedure was undertaken in June 2025.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed a Due Diligence Mergers and Acquisitions Procedure, which is revised annually. The last revision was undertaken in June 2025. This procedure aims to identify, assess, and mitigate potential risks, providing a structured and efficient roadmap that guides company integration using a risk-based approach.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a Closure, Decommissioning, and Divestment Procedure and risk analysis, which is revised annually. The last revision was undertaken in June 2025. The scope of the procedure addresses all the Entity's processes and outlines the steps to be followed according to the severity of the situation. In addition, the Entity has developed a Closure, Decommissioning, and Divestment Contingency Plan, and a checklist of the Due Diligence register.</p>

CRITERION	RATING	COMMENT
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity prepares an annual Sustainability Report, which discloses environmental, social and health and safety impacts and performance. The Entity's 2024 Sustainability Report is accessible at: <a href="https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf">https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has received no Material fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law reported in 2024. All fines are disclosed in the annual Sustainability Report which is accessible at: <a href="https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf">https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity adheres to Italian law which forbids payments to public administration outside a legal or contractual basis. The Entity has established a Management System with specific procedures to ensure legal compliance with local law. There is no evidence that these procedures were violated. The Entity discloses their position on payments to Governments in the 2024 Sustainability Report, pages 6-7: <a href="https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf">https://www.cromodorawheels.com/storage/2025/07/Bilancio-di-Sostenibilita-2024-1.pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has developed and implemented a Whistleblowing Policy and procedure. The procedure outlines the process for receiving complaints and grievances from Stakeholders. The process for submitting complaints is disclosed in the Entity's Code of Ethics, which is available at: <a href="https://www.cromodorawheels.com/whistleblowing">https://www.cromodorawheels.com/whistleblowing</a>. Stakeholders can submit complaints online, and is accessible at: <a href="https://cromodorawheels.integrity.complylog.com">https://cromodorawheels.integrity.complylog.com</a></p> <p>Workers have received training on the 'whistleblowing' mechanism, and an external lawyer oversees the 'whistleblowing' mechanism and investigations. There were no complaints reported in the last twelve months.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Carbon Footprint analysis using the 'cradle-to-grave' approach in accordance with ISO 14040. In the 2024 Sustainability Report, the Entity has provided information related to the identification and quantification of the relevant raw materials and energy used (page 14), identification of the processes involved in the production (pages 4 and 8), identification and quantification of relevant outputs generated from the production processes, including atmospheric emissions and Greenhouse Gases (GHG) emissions, wastewater, solid and liquid wastes.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted a Carbon Footprint analysis using the 'cradle-to-grave' approach in accordance with ISO 14040. A more detailed assessment is available to clients upon request.
4.2 Product Design	Conformance	The design and development process of Entity's products is manufactured in accordance with the clients' requirements. The Entity



CRITERION	RATING	COMMENT
		has made developments in the products produced for clients aimed at reducing the overall material used.
4.3a-b Aluminium Process Scrap	Conformance	The Entity's recycling plan is based on the processing of Scrap. Chips produced in the machining departments are remelted. All materials are correctly separated on-site, in accordance with an environmental analysis flowchart, including raw Aluminium alloys and other materials added to produce alloys as finished products. The production processes include automatic segregation of material to be recycled.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	<p>The Entity has established its recycling Policy within the framework of its Quality, Environment, Energy and Information Security Policy, available at:  <a href="https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-Rev_F.pdf">https://www.cromodorawheels.com/storage/2025/07/Politica-per-la-qualita-lambiente-lenergia-e-per-la-sicurezza-delle-informazioni_-Rev_F.pdf</a></p> <p>In addition, the Entity has published the specific actions arising from its recycling strategy at:  <a href="https://www.cromodorawheels.com/cromodora-wheels-starts-operation-of-a-new-chip-melting-furnace">https://www.cromodorawheels.com/cromodora-wheels-starts-operation-of-a-new-chip-melting-furnace</a> and  <a href="https://www.cromodorawheels.com/cromodora-wheels-starts-operation-of-a-chip-melting-furnace-supplied-by-hertwich-engineering/">https://www.cromodorawheels.com/cromodora-wheels-starts-operation-of-a-chip-melting-furnace-supplied-by-hertwich-engineering/</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>As the Entity's business model is 'business-to-business', it does not collect wheels at the end of their life. As part of its recycling strategy, the Entity however engages with other Stakeholders and signed agreements as part of its recycling strategy. An example of this approach is the agreement with Raffmetal S.p.A., which aims to develop, test, and patent an innovative high-performance recycled primary alloy that will maximise the recycled content in the Aluminium alloy. As a result of this initiative, the wheels will be manufactured with a primary alloy that will reduce energy consumption by 95% and CO<sub>2</sub> emissions by over 89%. Refer to:  <a href="https://www.giornaledibrescia.it/economia/raffmetal-cromodora-intesa-per-cerchi-in-lega-da-riciclo-k7d5nrm6">https://www.giornaledibrescia.it/economia/raffmetal-cromodora-intesa-per-cerchi-in-lega-da-riciclo-k7d5nrm6</a></p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.2a-g Discharges to Water	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.3a-g Assessment and Management of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.5a-c Waste Management and Reporting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.4 Alien Species	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.2a-e Gender Equity and Women's Empowerment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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's Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.2a-c Child Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3a-c Forced Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.4a-c Non-Discrimination	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.5 Communication and engagement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.6a-g Violence and Harassment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.7a-c Remuneration	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.8a-c Working Time	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.9a-b Informing Workers of Rights	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2 Employee engagement on Health and Safety	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 September 2025	Initial Certification Audit – Full Certification; Certification Expiry set for 31 May 2027 as per ASI Assurance Manual requirement for all Entities to be certified to the PS (PI-11) without exception by this date.