

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ZHENGZHOU GUANDONG ALUMINUM INDUSTRY CO., LTD.

CERTIFICATE
NUMBER

331

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SHANGHAI
KYLIN
CERTIFICATION
SERVICE CO.,
LTD.

DATE OF ISSUE

18 DECEMBER 2024

DATE OF EXPIRY

17 DECEMBER 2027

CERTIFIED SINCE

24 JANUARY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

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

Production Facility of Gongyi Guandong Metal Technology Co., Ltd., engaged in production of Aluminium sheet and Aluminium coil, located in Gongyi City, Henan Province, China and the Sales Office of Zhengzhou Guandong Aluminum Industry Co., Ltd., located in Zhengzhou City, Henan Province, China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Zhengzhou Guandong Aluminum Industry Co., Ltd.
ENTITY NAME	Zhengzhou Guandong Aluminum Industry Co., Ltd.
CERTIFICATION SCOPE	Production Facility of Gongyi Guandong Metal Technology Co., Ltd., engaged in production of Aluminium sheet and Aluminium coil, located in Gongyi City, Henan Province, China and the Sales Office of Zhengzhou Guandong Aluminum Industry Co., Ltd., located in Zhengzhou City, Henan Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (22 – 23 May 2023)Surveillance Audit (11 – 12 July 2024)Surveillance Audit (15 – 16 January 2026)
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none">22 – 23 May 2023 (Initial Certification Audit)11 – 12 July 2024 (Surveillance Audit)15 – 16 January 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 August 2023 (Initial Certification Audit)30 October 2024 (Surveillance Audit)5 March 2026 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (22 – 23 May 2023)</u></p> <p>The Audit Scope included the production Facility of Gongyi Guandong Metal Technology Co., Ltd. and the Sales Office.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (11 – 12 July 2024)</u></p>

The Audit Scope included the production Facility of Gongyi Guandong Metal Technology Co., Ltd.

The supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (15 – 16 January 2026)

The Audit Scope included the production Facility of Gongyi Guandong Metal Technology Co., Ltd.

The supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant 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

18 December 2024 – 17 December 2027

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

17 December 2027

CERTIFICATE
NUMBER

331

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>Zhengzhou Guandong, located in Jinshui District, Zhengzhou City, serves as the sales department and has provided its current office lease contract. Gongyi Guandong functions as the production department, leasing part of a workshop within another factory, and has provided the corresponding lease contract. Both sites share the same actual controller and legal representative.</p> <p>The Entity has appointed an ASI contact person as its regulatory coordinator. The Compliance Evaluation Report indicates that the Entity conducts regular regulatory reviews. The General Manager oversees labour, personnel, and overall compliance evaluation; Environmental Health and Safety (EHS) personnel are responsible for Environmental, Health and Safety aspects; and finance staff handle financial and tax compliance.</p> <p>The Entity has provided a List of Laws, Regulations, and Other Requirements covering national regulations related to EHS, labour, finance, and taxation. The annual Compliance Evaluation Report assesses compliance in environmental, Occupational Health and Safety (OH&S), labour, and financial areas, with results indicating compliance. The Entity holds an ISO 45001 Occupational Health and Safety Management System Certification.</p> <p>The Entity has engaged a law firm as legal counsel to support its production, management, operations, and foreign-related matters.</p> <p>Due to the age of the factory building, the Entity has been unable to obtain a fire safety inspection permit. Instead, a third-party professional organisation issued a Fire Safety Evaluation Report at the end of 2025, concluding that risks are controllable. Three rectification measures are currently in progress.</p> <p>The Entity, however, did not promptly identify the adjustment to the local minimum wage effective December 2025.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption and Anti-Bribery Control Procedure that prohibits all forms of Bribery, Corruption, and illegal payments to government officials. It also requires employees</p>

CRITERION	RATING	COMMENT
		<p>in sales and procurement roles to sign an Anti-Corruption Commitment Letter, pledging compliance with regulations and opposition to Corruption.</p> <p>The Entity's Business Ethics Policy emphasises fairness, integrity, and the prohibition of unfair competition. Expensive gifts are strictly prohibited.</p> <p>Since the last Audit, there have been no reported violations of integrity or ethical conduct, either internally or externally.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established an ASI Manual and a Corporate Code of Conduct, which set out standards for employee behaviour and social responsibility. The Code requires employees to oppose Corruption, extortion, and Bribery, and to comply with Applicable Law.</p> <p>The Entity has committed to prohibiting Child Labour and Forced Labour, and to complying with all relevant labour laws and regulations. Performance data from the past year has indicated no violations.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an integrated ASI Governance Policy that incorporates its social responsibility, environmental, Occupational Health and Safety (OH&S), safety management, Business ethics, governance, and purchasing Policies.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's ASI Governance Policy has been approved and issued by the General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has published its ASI Governance Policy on its website and displayed it in offices and workshops. Employee interviews indicate a basic understanding of the Policy.</p> <p>http://cn.zzgdalu.com/newsx/7.html</p>
2.2 Leadership	Conformance	The Entity has appointed two Management Representatives, the General Manager and the Factory Manager. Appointment letters confirm their responsibility for implementing the ASI Performance Standard and ensuring compliance with its requirements.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established an ISO 14001:2015 certified Environmental Management System, with the Certification Scope consistent with that of ASI.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained an ISO 45001:2018 Certification, with the Certification Scope consistent with ASI requirements.</p> <p>In addition, it has implemented procedures including a Women’s Labour Protection Policy, Anti-Discrimination Control Procedure, Child Labour Remediation Procedure, Prohibition of Forced Labour Control Procedure, Prohibition of Physical Punishment and Harassment Control Procedure, and Employee Complaint Handling Procedure.</p> <p>Employee interviews indicate no violation of the Entity’s social responsibility procedures.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has established a Responsible Procurement Policy addressing transparent transactions, accountability, quality focus, win-win cooperation, and environmental considerations. Its main suppliers are two in-province Aluminium material suppliers, both of which have signed Supplier Commitment Letters committing to integrity, self-discipline, and not sourcing raw materials from conflict minerals.</p> <p>Chemical suppliers with smaller procurement volumes have also signed Supplier Commitment Letters. The Entity reports no supply chain integrity issues in the past year, and no such issues have been identified.</p>
2.5 Impact Assessments	Conformance	The Entity currently operates in a leased workshop, while a newly constructed factory, outside the Audit Scope, and is located in a neighbouring town within the county. The new Facility has implemented a New Project Impact Control Procedure and an Environmental Factor Identification and Evaluation Control Procedure. An Environmental Impact Report Form, dated September 2025, has been issued.
2.6 Emergency Response Plan	Conformance	The Entity’s Gongyi production Facility has established Emergency Response Plans addressing safety and fire prevention, evacuation of personnel in accident scenarios, and incidents involving electric shock, vehicle accidents, and

CRITERION	RATING	COMMENT
		<p>mechanical injuries. Since the last Audit, the Facility has conducted two fire drills. Gongyi Guandong's Emergency Response Plans are available at: http://cn.zzgdalu.com/upload/file/20231111/2023111150533073307.pdf</p> <p>The Entity's Zhengzhou office has established a fire drill plan and, in coordination with the building's property management, and have conducted fire source suppression and evacuation drills in July 2025.</p>
2.7 Mergers and Acquisitions	Conformance	The Entity has established a Merger and Acquisition Management Procedure, which requires Due Diligence on Environmental, Social, and Governance (ESG) issues in the case of mergers and acquisitions. The Entity is not currently involved in any mergers or acquisition activity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a Divestment, Closure, and Decommissioning Management Procedure requiring ESG Due Diligence in cases of closure, decommissioning or divestment. The Entity currently has no plans for closure, decommissioning or divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has developed a 2023 Sustainability Report addressing both Zhengzhou Guandong and Gongyi Guandong. The Report publicly discloses data on compliance and accountability, payments to governments, Greenhouse Gas (GHG) emissions, air and water emissions, Leakage incidents, Waste and water management, risk disclosure, Biodiversity management, and Human Rights Due Diligence.</p> <p>It has also outlined the overall implementation of social responsibility, including performance indicators related to social responsibility, environmental performance, labour practices, Human Rights, and Product performance. The Sustainability Report is available at: http://cn.zzgdalu.com/upload/file/20240712/2024071211160854854.pdf</p>
3.2 Non-compliance and liabilities	Conformance	Since the last Audit, the Zhengzhou sales office and Gongyi production Facility have not received any violations or penalties, as confirmed through the government credit information website. The

CRITERION	RATING	COMMENT
		Sustainability Report also states that the Entity has no record of violations or penalties.
3.3a Payments to governments (legal and contractual)	Conformance	Both the Zhengzhou sales office and Gongyi production Facility have paid taxes, surcharges, and social security contributions to the relevant Government authorities in accordance with applicable regulations, as confirmed by the Entity's Finance Department. No other related payments were identified. In addition, the new factory has paid applicable expenses including land transfer fees and property taxes.
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	Conformance	<p>The Entity has established an Employee Complaint Handling Control Procedure and a Stakeholder Information Complaint and Appeal Handling Procedure. Zhengzhou employees may provide feedback directly to the General Manager, while Gongyi factory employees may submit suggestions via an on-site suggestion box.</p> <p>Since the last Audit, four employee complaints or grievances have been recorded, including concerns related to low wages, which have been addressed and improved. The Entity has defined an effective appeal process that require complaints or grievances to be handled in a timely manner in accordance with applicable regulations. No feedback from other Stakeholders has been received in the past year.</p> <p>The Entity has published a complaint hotline and email address on its website. Employee interviews indicated no complaints from nearby residents or other relevant Stakeholders.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a 2025 Life Cycle Assessment (LCA) Report for its main Product, 8011 Aluminium plates.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report includes a cradle-to-gate assessment of the Product lifecycle, including energy consumption, Waste emissions, and Greenhouse Gas (GHG) emissions associated with Primary Aluminium, Aluminium coils, transportation processes, and incoming raw materials.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's LCA report is available on the Entity's website: http://cn.zzgdalu.com/upload/file/20260115/20260115090733073307.pdf
4.2 Product design	Conformance	The Entity has developed a Product Design Impact Procedure requiring minimisation of production losses and environmental impact. Its Products include Aluminium plates and Aluminium coils. There is no material loss during the surface cleaning of Aluminium coils. Aluminium plate widths are typically customised according to customer specifications, with coils processed accordingly. Normally, each Aluminium coil generates only head and tail Waste and non-conforming Scrap. When trimming is required, the closest available material width is selected to minimise Waste.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has developed a Waste Recycling Rate and Target Statistics Form and established a 100% recycling target. A material balance statistics table is maintained to minimise Scrap generation during processing, including offcuts from start/end processing and non-conforming Scrap. The finished Product rate target is 98.5%. The actual rate was 97.58% in 2024 due to production environment factors and reached 98.3% by November 2025. Waste generated from minimal trimming of Aluminium coils is sold to Aluminium coil producers with melting and casting capabilities for recycling. The Entity has maintained shipping records for all Scrap returned to suppliers, including alloy grade and weight.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's Aluminium plate production mainly consists of 3-series and 8-series Products, with minimal material losses. Aluminium coil production generates no Scrap. Temporary Scrap storage areas are separated for 3-series and 8-series materials. Scraps are labelled by alloy type at the centralised storage point to enable classified handling, sale, and reuse.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	The Entity's Products are mainly processed and exported for use as bottle caps, which are typically sorted or disposed of as general Waste at end-of-life. As a result, the Entity does not collect or recycle these Products after use.

CRITERION	RATING	COMMENT
		The Entity, however, does not have a recycling strategy that includes specific timelines, activities, and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity's Products are disposed of by end consumers and is primarily sold to foreign enterprises. After classification and disposal in accordance with local regulations, it enters Waste management systems operated by disposal companies. The Entity has limited influence over end users in overseas markets.</p> <p>Both Aluminium suppliers use Recycled Aluminium, and the Entity prefers suppliers that utilise recycled material. ESG communication with customers is managed by the sales team.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity uses both natural gas and electricity at the Gongyi production Facility, while the Zhengzhou sales office uses electricity only. Electricity consumption at the Zhengzhou office accounts for less than 3% of the Entity's total energy consumption.</p> <p>The Entity's energy use data and 2026 Emissions Targets and Plan, including direct and indirect emissions for 2023-2025, is available at: http://cn.zzgdalu.com/upload/file/20260115/20260115090962866286.pdf</p> <p>The Entity, however, used a national average electricity emission factor, not Henan Province's factor.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has set a GHG emissions reduction target of 3% per year over the next five years. The Zhengzhou office accounts for a small proportion of total electricity consumption.</p> <p>To reduce emissions, the Entity plans to install rooftop solar panels at the new factory. In addition, a variable frequency air compressor has been purchased and installed, resulting in reduced electricity consumption.</p> <p>Based on current data, the cumulative reduction in Scope 1 and Scope 2 GHG emissions per unit of production for 2024–2025 is approximately 20%.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	<p>The Entity has conducted annual assessments of its atmospheric emissions, with the most recent assessment completed in March 2025. The emission source is natural gas combustion, and the testing report confirms that exhaust gas emissions comply with applicable requirements.</p> <p>Compared with the 2024 test report, nitrogen oxide concentrations in exhaust gas have slightly increased, while particulate matter concentrations have significantly decreased. Natural gas consumption has also declined significantly over the past three years.</p>
6.2 Discharges to Water	Conformance	The Entity's production processes do not generate industrial wastewater discharge; any industrial wastewater is recycled. Domestic wastewater is discharged into the factory sewer system and then directed to a septic tank.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has established an Emergency Preparedness and Response Control Procedure requiring emergency plans for environmental, safety, and other incidents, as well as the provision of necessary emergency equipment. Emergency response Facilities are regularly inspected.</p> <p>The procedure defines the response and handling process following incident occurrence. The Entity has provided a 2024–2025 Leakage Risk Identification and Evaluation Report, and no Leakage incidents have occurred since the last Audit.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has established an Emergency Plan for Sudden Environmental Incidents and an Emergency Plan for Chemical Leakage. The workshop is equipped with emergency supplies, including fire extinguishers, protective clothing, first aid kits, disinfectant masks, and firefighting sand. The Emergency Response Plans are available at: http://cn.zzgdalu.com/upload/file/20260115/20260115091193439343.pdf and</p>

CRITERION	RATING	COMMENT
		http://cn.zzgdalu.com/upload/file/20260115/20260115091199929992.pdf
6.4a Reporting of Spills (immediate disclosure)	Minor Non-Conformance	<p>The Entity has established Emergency Response Plans for sudden environmental or safety incidents. Since the last Audit, no Leakage incidents have occurred, and a public statement confirming the absence of such incidents is available at: http://cn.zzgdalu.com/upload/file/20260115/20260115091660716071.pdf</p> <p>The Entity, however, does not have a process for the immediate disclosure of incidents.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has disclosed that no Spills or Leakage incidents have occurred, as available at: http://cn.zzgdalu.com/upload/file/20260116/2026011616350689689.pdf</p> <p>Since the last Audit, no Leakage incidents have occurred, and a public statement confirming the absence of Leakage incidents has been issued, available at: http://cn.zzgdalu.com/upload/file/20260115/20260115091660716071.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has established Waste disposal management measures in accordance with Waste prevention and control, clean production, and circular economy principles. Leakage prevention is implemented throughout Waste collection, storage, transportation, utilisation, and disposal processes.</p> <p>Hazardous Waste is managed by a qualified external contractor, with transfer forms maintained. In 2025, three Hazardous Waste transfers were recorded. Scrap Aluminium is sold to recycling companies or suppliers for reuse and recycling.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has publicly disclosed the amount of solid Waste generated in 2025, including sludge, Waste Aluminium, Hazardous Waste, and Waste packaging materials, available at: http://cn.zzgdalu.com/upload/file/20260115/20260115085832243224.pdf</p>
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.

CRITERION	RATING	COMMENT
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	<p>The Zhengzhou sales office uses municipal water, with overall low water consumption. The Gongyi production Facility's water is supplied by the landlord for general, hygiene, and production use. Production water is recycled and replenished to compensate for evaporation.</p> <p>The 2024–2025 Water Use Inventory indicates that total daily water consumption is approximately four metric tonnes. A small portion is used for domestic purposes, while most is used to replenish circulating water. A 2026 water usage plan has been developed to maintain current consumption levels.</p>
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CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity has developed a Water Resource Risk Assessment Report for the Gongyi production Facility, which concludes that the limited groundwater extraction in Gongyi City has low impact and that the overall risk level is low. The Entity has also provided the landlord's water extraction certificate.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity, as its water consumption is low and the risk assessment indicates a low level of risk.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity, as its water consumption is low and the risk assessment indicates a low level of risk.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has established a Water Use Plan, available at: http://cn.zzgdalu.com/upload/file/20260115/20260115090939873987.pdf</p> <p>The Gongyi production Facility used 1,291 metric tonnes of recycled industrial water in 2024 and 1,275 metric tonnes in 2025. The planned usage for 2026 is 1,255 metric tonnes.</p> <p>The Entity only discharges domestic wastewater, as industrial wastewater is fully recycled, and the discharge volume is minimal.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has conducted an environmental analysis and provided a Biodiversity Assessment Report covering flora and fauna resources in Gongyi County. No key protected species or habitats have been identified within 500 metres of the Facility. The assessment concludes that the impact on local Biodiversity is low.</p> <p>The Gongyi factory occupies a relatively small area. Its surroundings include a small forest to the east, a railway to the south, and a river to the west. Across the river is a residential area under construction located more than 100 metres away.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment indicates that the impact on the surrounding Biodiversity is low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment indicates that the impact on the surrounding Biodiversity is low.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment indicates that the impact on the surrounding Biodiversity is low.
8.3 Alien Species	Conformance	The Entity has developed control measures for Alien Species, and fumigation is required for wooden pallets from overseas. Some on-site pallets used for foreign markets bear high-temperature fumigation marks.
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 mines)	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 established a Human Rights Policy committing to compliance with international Human Rights declarations and conventions and to fulfilling key social responsibilities.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Investigation and Control Procedure that defines the principles and understanding of Human Rights, aims to prevent adverse Human Rights impacts through its activities, and manages any impacts that do occur. The Entity has also prepared a 2024–2025 Human Rights Due Diligence Report, which concludes that it does not engage in any Human Rights violations.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted Human Rights Due Diligence and found no adverse impacts on Human Rights. It has also established a Child Labour Remediation Plan and a Human Rights Investigation and Control Procedure to address any potential adverse impacts.
9.2 Women’s Rights	Conformance	The Entity has established a Labour Protection Policy for Female Workers that safeguards women’s legitimate rights and interests. Its Risk Control Procedure for Newborn Mothers and

CRITERION	RATING	COMMENT
		Pregnant Women further ensures the protection of their rights. More than half of the Entity's employees are female. Interviews with female employees at the Gongyi production Facility have indicated no incidents or violations.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as no presence of Indigenous peoples or their lands, territories and resources have been identified within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as no presence of Indigenous peoples or their lands, territories and resources have been identified within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites within 1–2 kilometers of the Zhengzhou office or Gongyi factory. The nearest religious site to the Gongyi Facility, Shaolin Temple, is located at a considerable distance.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, as its operations have not caused any resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, as its operations have not caused any resettlements.
9.7a Local Communities (rights and interests)	Conformance	There are no residential areas adjacent to the Gongyi production Facility. Housing under construction to the west of the site is nearly complete but remains vacant. The Entity's employees are primarily local residents.
9.7b Local Communities (impacts)	Conformance	The Entity occupies a small land area and has no adverse impact on the Local Communities. The resettlement housing community across the river to the west, located more than 100 meters away, is not expected to experience any significant impact.
9.7c Local Communities (livelihoods)	Conformance	The Entity's employees mainly come from neighbouring communities. The factory is small in scale and has limited interaction with Local Communities due to minimal impacts from its operations. The Entity donated RMB 10,000 to the Henan Provincial Charity Federation in 2024 and RMB 3,000 in 2025.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity's main raw material, Aluminium coils, is sourced from factories within the same province. Most of the Aluminium used in these factories

CRITERION	RATING	COMMENT
		comes from recycled materials. Suppliers have signed a commitment letter confirming that they do not source raw materials from Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has also established management regulations for investigating conflict minerals and does not purchase materials from CAHRAs.
9.9 Security practice	Conformance	The Gongyi production Facility does not employ security guards. Goods are registered by dispatchers during transportation. The rented factory has security guards who assist only with visitor registration at the entrance and do not affect employees. The Zhengzhou sales office has no security guards, while building security is limited to access control only.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable, as the Entity adheres to Applicable Law in China regarding Freedom of Association and Right to Collective Bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has implemented a Freedom of Association and Collective Bargaining Control Procedure, which stipulates that employees are free to join unions and engage in Collective Bargaining. No Collective Bargaining activities have occurred to date. Employees with suggestions typically report them directly to their supervisors.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has a total of 30 employees across both sites. A safety representative is available, but there is no union. The Entity has committed, as required by its documentation, to support the formation of a union should employees request one.
10.2a Child Labour (minimum age)	Conformance	The Entity has established a Control Procedure for Prohibiting the Use of Child Labour, which prohibits the employment of individuals under the age of 16 in accordance with Chinese regulations.
10.2b Child Labour (hazardous)	Conformance	The youngest employee at the Entity is 22 years old. If Child Labour under the age of 16 is identified, remedial procedures must be initiated. The Entity has also developed a Child Labour Remediation Procedure.
10.2c Child Labour (worst forms)	Conformance	The youngest employee at the Entity is 22 years old. If Child Labour under the age of 16 is identified, remedial procedures must be initiated. The Entity

CRITERION	RATING	COMMENT
		has also developed a Child Labour Remediation Procedure.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits any direct or indirect support for Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits requesting any form of deposit, recruitment fee, or equipment from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits Migrant Workers from being required to provide deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits debt bondage or forcing Workers to work to repay debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits unreasonable restrictions on Workers' freedom of movement in the workplace or on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits the retention of employees' original identity cards, work permits, travel documents, or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established a Control Procedure for Prohibiting Forced Labour, which prohibits depriving Workers of the freedom to report issues or terminate their employment within a reasonable timeframe without fear of punishment.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Control Procedure, which prohibits Discrimination in employee recruitment, compensation, training, promotion, and dismissal. The procedure requires gender equality and equal pay for equal work. Employee interviews have indicated no apparent incidents of Discrimination.
10.5 Communication and engagement	Conformance	The Entity has established a Communication and Engagement Management Control Procedure, which defines internal and external communication channels. The Entity shares announcements with departments and employees via social media and other formats. Employees may provide feedback to management through email, social media, face-to-

CRITERION	RATING	COMMENT
		face communication, and meetings. A suggestion box is also located at the workshop entrance for employee input. In 2025, four suggestions were received. The workshop manager collects employee feedback, and the Gongyi production Facility summarises and processes it accordingly.
10.6 Disciplinary practices	Conformance	The Entity has established reward and disciplinary measures, which include verbal warnings and dismissal. No employees have been dismissed in the past year. Verbal warnings do not involve any financial penalties. Employee interviews confirmed that verbal warnings have been issued for production quality issues, but no financial penalties, physical punishment, or verbal abuse have been imposed.
10.7a Remuneration (living wage)	Minor Non-Conformance	<p>Employees at the Zhengzhou sales office have social security contribution records, and the Gongyi factory has also arranged social security coverage for all employees.</p> <p>The legal minimum wage in Zhengzhou and Gongyi was adjusted to RMB 2,350 per month starting in December 2025. A review of wage records for October, November, and December 2025 confirmed that all employees met the minimum wage requirement. For two employees who received less than RMB 2,350, the Human Resources department explained that the lower amounts were due to personal leave.</p> <p>Wage slips, however, were not proactively issued, and employees need to go to the Finance Department to view wage details. Although, the wage slips include an Overtime column, Overtime pay is not itemised and is instead recorded as 'other expenses.'</p>
10.7b Remuneration (method of payment)	Conformance	The Entity pays salaries around the 25th of the following month.
10.8 Working Time	Minor Non-Conformance	<p>The Entity's working hours regulations indicate that the Zhengzhou sales office operates on an eight-hour schedule from Monday to Friday. Attendance records from October and December 2025 were sampled for review.</p> <p>The Gongyi production Facility operates with both day and shift Workers. The standard shift is eight hours per day, five days per week. Shift work is</p>

CRITERION	RATING	COMMENT
		<p>organised into two shifts: 08:00–16:00 and 16:00–24:00.</p> <p>A random review of attendance records from August to December 2025, however, showed that some employees worked up to eight hours of Overtime per week in August and September 2025. In addition, employee interviews indicated that there are no formal regulations regarding paid annual leave.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed and implemented an ISO 45001 certified Management System and an Occupational Health and Safety (OH&S) Policy. The Policy is reviewed annually and has been approved and supported by the General Manager. The Entity has also established Health and Safety objectives and regularly reviews their progress.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has implemented an ASI Policy, which includes the OH&S Policy, and it is displayed on the bulletin board at the factory and the notice board at the sales office.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Entity has established a Health and Safety Policy addressing the principles of safety first, individual responsibility, and prevention. The Entity has also developed an ASI Manual to implement the Policy and ensure compliance with ILO Conventions 155 and 176.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has stipulated in its ASI Manual that employees should be aware of workplace hazards and safety measures and are entitled to refuse or stop unsafe work.</p>
11.2 OH&S Management System	Minor Non-Conformance	<p>The Entity has established an Occupational Health and Safety (OH&S) Management System, including manuals, procedures, and work instructions. These documents require the Entity to identify applicable regulations and comply with relevant regulatory requirements. The Entity has a Health and Safety Representative who participates in regular management meetings.</p> <p>The on-site Hazardous Waste warehouse, however, was not equipped with fire extinguishers as required, and access to a fire hydrant was obstructed on site.</p>

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has established a Health and Safety Committee, with the workshop supervisor serving as the Safety Representative. The Committee requires Workers to participate in Health and Safety reviews of the EHS manual.
11.4 OH&S performance	Conformance	The Entity has provided information on the achievement of OH&S goals and indicators, with targets including 100% Waste classification and disposal, and zero incidents of fire, mechanical injury, and electric shock. Performance is recorded on a quarterly basis, and current statistics indicate that these targets have been met.

Document Control and Version History

Revision	Date	Notes
0	24 January 2024	Initial Certification Audit - Provisional Certification
1	18 December 2024	Surveillance Audit – Full Certification
2	14 May 2026	Surveillance Audit – Full Certification