

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Ningbo Xusheng Group Co., Ltd.

CERTIFICATE NUMBER
408

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
8 JANUARY 2025

DATE OF EXPIRY
7 JANUARY 2028

CERTIFIED SINCE
8 JANUARY 2025

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

The Group Headquarters, Factory 5,
6 and 7 of Ningbo Xusheng Group
Co., Ltd, located in Ningbo, China
and manufactures Aluminium alloy
parts.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ningbo Xusheng Group Co., LTD
ENTITY NAME	Ningbo Xusheng Group Co., Ltd.
CERTIFICATION SCOPE	The Group Headquarters, Factory 5, 6 and 7 of Ningbo Xusheng Group Co., Ltd., located in Ningbo, China and manufactures Aluminium alloy parts.
SUPPLY CHAIN ACTIVITIES	• Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (2 – 5 September 2024) • Surveillance Audit (19 – 22 May 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 2 – 5 September 2024 (Initial Certification Audit) • 19 – 22 May 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 16 October 2024 (Initial Certification Audit) • 24 June 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (2 – 5 September 2024)</u> The Audit Scope included the main production processes of Aluminium alloy ingot casting, forging, extrusion and CNC machining at Ningbo Xusheng Group Co., Ltd. – Headquarters, Factory 5, 6 and 7. Supply chain activities included in the Audit Scope: • Casthouses • Semi-Fabrication • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (19 – 22 May 2026)</u> The Audit Scope included the main production processes of Aluminium alloy ingot casting, forging, extrusion and CNC machining at Ningbo Xusheng Group Co., Ltd. – Headquarters, Factory 5, 6 and 7. Supply chain activities included in the Audit Scope: • Casthouses • Semi-Fabrication • Material Conversion

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

8 January 2025 – 7 January 2028

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

7 January 2028

CERTIFICATE NUMBER

408



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Ningbo Xusheng Group Co., Ltd. (the 'Entity') was established in 2003 and is headquartered in Ningbo, China, and operates three main divisions: die casting, forging, and extrusion integration. The Entity specialises in electric drive systems, electronic control systems, battery systems, chassis suspension systems, and high-performance body systems for new energy vehicles.

The Entity which encompasses the Group Headquarters as well as Factory 5, Factory 6, and Factory 7, focuses on the main production processes including Aluminium alloy ingot casting, forging, extrusion, and CNC machining. Its key products consist of automotive Aluminium alloy beams, various types of casings, and valve bodies. The Entity's area is free of settlements, schools, cultural landmarks, water bodies, nature reserves, and other significant Biodiversity features.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	High	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented comprehensive Policies, Management Systems, procedures, and processes to ensure compliance with applicable legal requirements. The legal compliance function oversees compliance with relevant laws, regulations, and other obligations across the Entity, including through annual compliance reviews. All applicable legal and regulatory requirements have been systematically identified, with no Material compliance deficiencies identified or reported.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented Policies and procedures to identify, prevent, and mitigate Corruption risks, including the Anti-Commercial Bribery Management Program. In compliance with Applicable Law and regulations, the Entity commits to preventing misconduct, including Bribery and extortion. Targeted training has been provided to personnel in high-risk roles, who are also required to sign an Anti-Corruption Commitment. Anti-Corruption controls are regularly assessed, and periodic internal control audit reports indicate that no Corruption instance has been identified in the past three years.
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented a Code of Conduct outlining principles for Environmental, Social, and Governance (ESG) performance. Training and communication initiatives have been developed to raise awareness of the Code among employees, Business partners, and suppliers. The Code is formally reviewed annually, with additional reviews conducted when significant Business changes affect ESG risks or control gaps are identified. The Code of Conduct is available to all Stakeholders at: https://www.nbxus.com/uploads/files/1.3.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented an ASI Management Policy addressing environmental, Human Rights, Health and Safety, and responsible procurement requirements. The Policy has been communicated internally to all employees and externally to Stakeholders, available at: https://www.nbxus.com/uploads/files/2.1.pdf The Entity commits to reviewing the Policy annually and whenever significant changes in Business operations affect ESG risks or reveal control gaps.
2.2a-c Leadership	Conformance	As a member of senior management, the Entity's Assistant General Manager serves as the ASI Management Representative and is responsible for establishing and implementing ASI Standards across the Entity. The Management Representative also oversees communication of ASI Policies throughout the Entity. A cross-departmental ASI working group has been established to support implementation, and ASI Policies and management procedures have been communicated to all employees through various training courses.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established and documented an Environmental Management System and holds a valid ISO 14001:2015 Certification.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management System in accordance with the ASI Performance Standard. Social impacts and risks, including those related to Human Rights, Occupational Health and Safety (OH&S), and Business ethics, have been identified and assessed. Management measures have been developed and implemented to prevent or mitigate these impacts.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has established and implemented Policies, systems, procedures, and processes in compliance with responsible sourcing requirements. These include conducting second-party Due Diligence audits of key next-tier suppliers for qualification and providing annual training to procurement and relevant personnel. The purchasing Policies have been documented in the ASI Policy, available at: https://www.nbxus.com/uploads/files/2.4.pdf The Policies are periodically reviewed during management review meetings and updated when significant Business changes affect ESG risks or when control deficiencies are identified. It was identified that social responsibility audits, however, were not conducted for certain service-type suppliers, including surface treatment providers.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it does not have any New Projects or Major Changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred since 2022, when the Entity joined ASI. The Entity has, however, established a management procedure and committed to conducting a Human Rights Impact Assessment (HRIA), implementing a gender-sensitive Human Rights Impact Management Plan, and periodically reviewing the plan or when control deficiencies are identified if any future New Project or Major Change arises.
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 Certifications and has developed and implemented emergency response plans as part of its management processes. The Audit has verified the training of emergency response personnel and the completion of drills. The Entity's environmental emergency plans have been registered with the relevant Government agencies and available at: https://www.nbxus.com/uploads/files/ASI20260623/2.7.pdf https://www.nbxus.com/uploads/files/ASI20260623/6.36.4.pdf https://www.nbxus.com/uploads/files/ASI20260623/6.36.4-1.pdf The Entity's Comprehensive Emergency Response Plan for Workplace Production Safety Accidents, however, expired in May 2026. The Entity is currently engaging experts to prepare and review a new plan.
2.8a-d Suspended Operations	Conformance	The Entity has established a procedure to manage ESG aspects during closure, decommissioning, and divestment activities, including situations where operations may be suspended or significantly modified due to external factors. The Entity commits to complying with

CRITERION	RATING	COMMENT
		Applicable Law and internal Policies on layoffs, including consultation with employee representatives. The suspension process is reviewed annually and reassessed when significant ESG risks arise from changes in Business activities or identified control gaps. No such suspension events have occurred in the past three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Mergers and Acquisitions Management Procedure in accordance with the ASI Performance Standard. Senior management commits to conducting Due Diligence for any future mergers or acquisitions to ensure that all relevant ESG requirements under the ASI Performance Standard are addressed, including those related to historical Aluminium operations. As a publicly listed Entity, no such transactions have occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Closure, Decommissioning, and Divestment Management Procedure in accordance with the ASI Performance Standard. Senior management commits to reviewing relevant ESG practices during future closure, decommissioning, or divestment planning, where applicable, and developing a plan to monitor significant ESG impacts. As a listed Entity, no such activities have occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has conducted a Materiality assessment to identify key Stakeholder concerns, including air pollution and Hazardous Waste management. Its management approach and performance on Material issues have been disclosed in its 2025 Annual Sustainability Report, available at: https://www.nbxus.com/uploads/files/ASI20260623/3.1.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed in its 2025 Sustainability Report (page 40) that, over the past three years, it has not been subject to any significant fines, judgments, penalties, or non-monetary sanctions for non-compliance with Applicable Law. Refer to: https://www.nbxus.com/uploads/files/ASI20260623/3.1.pdf
3.3a-c Payments to Governments	Conformance	The Entity has made all payments to governments on a legal or contractual basis, whether directly or through authorised representatives. Such payments have been disclosed in its 2025 Annual Sustainability Report, page 41: https://www.nbxus.com/uploads/files/ASI20260623/3.1.pdf and in its Financial Report, available at: https://www.nbxus.com/uploads/files/ASI/3.3.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established and implemented a formal mechanism for receiving and handling complaints and grievances, with defined resolution procedures, available at: https://www.nbxus.com/uploads/files/ASI/3.4.pdf and https://www.nbxus.com/uploads/files/ASI/3.4-2-1.pdf A dedicated email address is available for internal and external Stakeholders to submit complaints and feedback. To date, no significant complaints have been received. Complaints, Stakeholder concerns, and resolution processes are reviewed annually during ASI management review meetings. The Entity commits to further

CRITERION	RATING	COMMENT
		reviewing and updating the mechanism whenever Business changes affect Material ESG risks or when potential control gaps are identified.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has conducted environmental Life Cycle Assessments (LCAs) for its three main Products in accordance with international standards, including ISO 14040 and ISO 14044, using SimaPro software and data from the Ecoinvent 3.9 database. Inappropriate data allocation during the assessment, however, has resulted in certain environmental impact results for individual Products deviating from expected ranges.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed a Product Life Cycle Environmental Impact Assessment Report and discloses key environmental impact information to customers across the 'cradle-to-gate' life cycle through established communication channels. This includes data on material consumption, energy use, and Waste generation per unit of Product, as well as information on data collection and calculation methodologies. Stakeholder engagement is supported through a hotline and a dedicated email address.
4.2 Product Design	Minor Non-Conformance	The Entity has incorporated multiple sustainability indicators into its Product design process, including reducing Product weight to lower life cycle environmental impacts while meeting technical specifications, and improving Product disassemblability and recyclability through material and process design. The Entity, however, does not yet regularly monitor certain sustainability indicators during the design process, such as Recycled Aluminium content and Product weight reduction. A more systematic approach is therefore needed to manage Product sustainability during design and development.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has set a target to collect, recycle, and/or reuse 100% of Process Scrap, supported by a Scrap Management Procedure. To minimise Aluminium Process Scrap, the Entity has implemented technological and management measures across its operations. All Scrap is collected, internally recycled, and sent for remelting and reuse. The Entity uses three alloy series across forging, extrusion, and die-casting processes, with Scrap identified and segregated for recycling at each stage.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established a Recycled Aluminium utilisation strategy, with a long-term target of sourcing 40% of total production from Recycled Aluminium by 2037. To support implementation, the Entity has qualified Recycled Aluminium suppliers and conducted related procurement activities. As of the end of 2025, Recycled Aluminium procured and utilised by the Entity accounted for more than 10% of total Aluminium procurement. The Entity commits to annually reviewing progress against its Recycled Aluminium targets and updating related strategies, objectives, and plans following management review meetings. The strategy has been publicly disclosed on the Entity's website and is available at: https://www.nbxus.com/uploads/files/4.4.pdf

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with customers and Recycled Aluminium ingot suppliers through collaborative activities, including Product design, alloy development, and quality qualification, to explore opportunities to improve Product end-of-life recycling rates and promote the Circular Economy.

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has quantified its Material GHG emissions within the defined boundary for 2025, covering Scope 1, Scope 2, and relevant Scope 3 categories, including emissions from purchased raw materials and transportation. The Entity's 2025 GHG Emissions Report has been independently verified by a third party and is available at: https://www.nbxus.com/uploads/files/5.1.pdf Inappropriate emission factors, however, were applied to certain emission sources during the calculation process, resulting in inaccuracies in the reported emissions data.
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has developed a Greenhouse Gas (GHG) Emissions Reduction Strategy with intermediate and long-term targets to reduce the cradle-to-gate CO ₂ emissions intensities of its processes and procured material. The Entity has used the ASI GHG Pathway Methodology to assess the robustness of the plan. The assessment indicates that the proposed emissions reduction pathway is aligned with the 1.5°C scenario.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has developed a Greenhouse Gas (GHG) Emissions Reduction Strategy with intermediate and long-term targets to reduce the cradle-to-gate CO ₂ emissions intensities of its processes and procured material. The plan includes measures such as low-carbon material sourcing, energy efficiency improvements, renewable energy adoption, and enhanced operational practices. The strategy has been validated using ASI's GHG Pathway Methodology, confirming alignment with the 1.5°C scenario. Progress is reviewed annually, with the plan updated as needed. The Entity's GHG Reduction Plan Report is available at: https://www.nbxus.com/uploads/files/ASI/5.3-1.xls
5.4 GHG Emissions Management	Conformance	To implement the GHG Reduction Plan, the Entity has established and implemented management processes to improve energy efficiency and minimise Waste in daily operations and specific projects. Progress toward the GHG reduction targets is reviewed periodically.

6. EMISSIONS, EFFLUENTS AND WASTE

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Conformance	In accordance with its Environmental Management System and applicable legal requirements, the Entity has identified, assessed, and quantified Material air emissions from its activities. The Entity has implemented control plans to minimise exposure to and impacts from air emissions, with their effectiveness monitored periodically. The plans are reviewed regularly and when significant changes or non-Conformances occur. Air emission reduction targets and the control plan have been disclosed in the Entity's 2025 Sustainability Report, page 25: https://www.nbxus.com/uploads/files/ASI20260623/6.2-1.pdf
6.2a-g Discharges to Water	Conformance	In accordance with its Environmental Management System and applicable legal requirements, the Entity has identified, assessed, and quantified Material discharges to water from its activities. Control plans have been implemented to minimise exposure to and impacts from water discharges, with effectiveness monitored periodically. The plans are reviewed regularly and when significant changes or non-Conformances occur. Wastewater reduction targets and the control plan have been disclosed in the Entity's 2025 Sustainability Report, page 30: https://www.nbxus.com/uploads/files/ASI20260623/6.2-1.pdf and https://www.nbxus.com/uploads/files/ASI20260623/6.2.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Operational risk areas where Spills or Leakages could contaminate air, water, or soil have been assessed through the Environmental Management System's risk assessment process. A corresponding management plan has been developed and implemented. The Entity periodically reviews the plan, including following Spills or Leakages or significant changes in Business operations. The Entity's recent risk assessment and response plan are available at: https://www.nbxus.com/uploads/files/ASI20260623/6.36.4.pdf and https://www.nbxus.com/uploads/files/ASI20260623/6.36.4-1.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's Emergency Response Plan has outlined procedures for reporting Spills and Leakages, including notifying Affected Populations and Organisations. No Spills or Leakages have occurred in the past three years. The Entity's 2025 environmental performance information is available at: https://www.nbxus.com/uploads/files/ASI20260623/3.1.pdf and https://www.nbxus.com/uploads/files/ASI20260623/3.2.pdf
6.5a-c Waste Management and Reporting	Conformance	Waste management has been integrated into the Entity's Environmental Management System. The Entity has implemented a Waste Management Strategy aligned with the Waste Mitigation Hierarchy, with a focus on recycling to reduce Material impacts. Hazardous Waste has been disposed of in compliance with applicable legal requirements. The Entity has disclosed the quantities of Hazardous and Non-Hazardous Waste generated from its activities in 2025, available at: https://www.nbxus.com/uploads/files/ASI20260623/6.5.pdf The Entity has also disclosed its Hazardous Waste reduction target and control plan in its 2025 Annual Sustainability Report, page 21: https://www.nbxus.com/uploads/files/ASI20260623/3.1.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Dross is classified as Hazardous Waste in China. The Entity has complied with applicable legal requirements for its collection, labelling, and storage, with no observed or reported Leakages. All generated Dross has been transferred to licensed disposal suppliers approved by the relevant environmental authorities, with transfer information reported accordingly. The Entity reviews the disposal process annually. No landfilling has been identified.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and documented its water use by source and type in its Environmental Impact Assessment. Water-related risks have been assessed, considering the local water environment, withdrawal and discharge practices, and the effectiveness of existing management measures. The assessment concludes that the risk is low, with no significant water-related risks identified within the Entity's Area of Influence. The Water-Related Risks Report is available at: https://www.nbxus.com/uploads/files/ASI20260623/7172.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water-related risk have been assessed as low within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Biodiversity and Ecosystem Services risks and impacts have been assessed as part of Environmental Impact Assessments (EIA) conducted by qualified third parties. The EIA Reports, approved by the local Environmental Protection Bureau, confirm that no Biodiversity-sensitive areas are located within the Entity's Area of Influence. The Entity's three sites are located in industrial zones designated by local Governments and operate under effective Environmental Management Systems. No threatened species have been identified within the Entity's Area of Influence, resulting in a low Biodiversity risk level.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has assessed the risks of introducing Alien Species through its operations and logistics, including potential Material adverse impacts on Biodiversity and Ecosystem Services. The assessment concluded that the risk is low, and no intentional or unintentional introduction of Alien Species has occurred.

CRITERION	RATING	COMMENT
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity commits not to explore or develop New Projects or undertake Major Changes within World Heritage Properties. No World Heritage Properties are located within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity commits to complying with all applicable regulations and legal requirements related to Protected Areas and environmental protection. No Protected Areas are located within the Entity's Area of Influence.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a Business Code of Conduct committing to uphold Human Rights, promote gender equality, and comply with the UN Guiding Principles on Business and Human Rights, available at: https://www.nbxus.com/uploads/files/ASI/1.3.pdf The Entity regularly publishes a Human Rights Impact Assessment Report detailing engagement with affected communities and Complaints Resolution Mechanism. The Entity's annual reports, management reviews, and Stakeholder Grievance records indicate that the Entity's operations have not caused significant adverse Human Rights impacts. If any adverse impact is identified, the Entity commits to providing remedies or cooperating through legitimate processes.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established Policies to uphold women's rights and implemented programmes to promote gender equity and women's empowerment throughout the employment life cycle. No grievances from female employees have been reported, and interviews confirmed that women Workers are aware of their rights, with no adverse feedback identified. The Entity has also assessed its gender equity and women's empowerment initiatives, with the results available at: https://www.nbxus.com/uploads/files/ASI20260623/9.2.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has implemented a process to identify and assess sacred or cultural heritage sites and minimise potential impacts. Environmental and social impact assessments have been conducted for all new and existing projects, confirming that no such sites are located within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites, nor Indigenous Peoples, lands, territories, or resources identified within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has implemented investment and development management procedures for New Projects, requiring approval from the relevant local authorities. All existing projects are located in industrial zones designated by the local Government. No Indigenous Peoples have been identified within the Entity's Area of Influence, no resettlement has been required, and no New Projects have been developed since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's Annual Sustainability Report has outlined mechanisms for identifying, preventing, monitoring, mitigating, and communicating significant impacts from its activities, including Stakeholder engagement, Human Rights Due Diligence, Environmental Impact Assessments, environmental performance monitoring, supplier management, and community engagement. These mechanisms address potential Health and Safety, social and cultural rights, and environmental impacts. The Report, the Entity has minimal impacts on surrounding communities and organisations. The Affected Stakeholders and Organisations Management Plan is commensurate with the Entity's scale, circumstances, and level of impact risk.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has established a formal Policy to avoid conflict minerals and implemented a corresponding Management System addressing supply chain mapping, risk assessment, control measures, Due Diligence audits, and regular reporting. Relevant employees have received appropriate training to support effective implementation. The Policy requirements have also been communicated to suppliers, all of whom are required to sign a commitment confirming that no conflict minerals are used.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity regularly assesses supply chain risks to ensure that no conflict minerals are used and that materials are not sourced from Conflict-Affected and High-Risk Areas (CAHRAs). The Entity commits to addressing Human Rights risks, including Child Labour and Forced Labour, and ensuring that these issues are absent from its supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	Risk assessment records indicate that the Entity does not use conflict minerals, source materials CAHRAs, or have critical Human Rights issues, including Child Labour and Forced Labour, within its supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit, which fully addresses this requirement. As part of its Management System, the Entity has conducted annual ASI internal audits covering supply chain control processes, including

CRITERION	RATING	COMMENT
		the management of CAHRAs and supply chain social responsibility audits.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity commits to publicly reporting its supply chain Due Diligence on CAHRAs. The Entity's annual Supply Chain Due Diligence Report details its CAHRAs-related Due Diligence activities for 2025 and is available at: https://www.nbxus.com/uploads/files/ASI20260623/9.8.pdf
9.9 Security practice	Conformance	All security guards employed by the Entity have been required to uphold Human Rights in the performance of their duties. Policies prohibit body searches, and guards are required to perform their responsibilities humanely. They receive comprehensive training on their obligations and the importance of respecting Human Rights. No grievances or complaints regarding security conduct have been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, they adhere to Applicable Law in China regarding Freedom of Association and Right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of employee association through an Employee Representative Committee. Representatives are freely elected, and a Worker Council has been established within the Entity. Representatives meet with management to address employee concerns.
10.2a Child Labour	Conformance	In compliance with Chinese law, Child Labour is strictly prohibited, with the legal minimum working age set at 16. The Entity has implemented Policies that prohibit Child Labour and protect young Workers. The Entity currently employs no Child Labour or young Workers.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking, applicable to both the Entity and its suppliers. The Policy prohibits Forced Labour, slavery, and Human Trafficking. No incidents of illegal wage deductions, debt bondage, or other forms of Forced Labour have been reported. Further details on the Policy and its implementation are available in the Entity's Code of Conduct at: https://www.nbxus.com/uploads/files/ASI20260623/1.3.pdf and 2025 Annual Sustainability Report at: https://www.nbxus.com/uploads/files/ASI20260623/6.2-1.pdf The Entity has outlined its measures to combat Modern Slavery in its Anti-Slavery and Anti-Trafficking Statement, available at: https://www.nbxus.com/uploads/files/ASI20260623/10.3.pdf
10.4a-c Non-Discrimination	Conformance	The Entity commits to promoting non-Discrimination across its operations, with no Discrimination instances reported. This commitment has been reflected in its recruitment process, where job advertisements and training plans emphasise that decisions are based solely on candidates' qualifications, regardless of personal characteristics. Interviews with employees further confirmed that they feel equally treated and valued.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	Communication channels have been established between management, Workers, and their representatives and communicated to the workforce. These channels enable employees to raise concerns and grievances regarding working conditions and compensation and seek resolution without fear of retaliation or mistreatment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies prohibiting Harassment and bullying. An informative brochure has been distributed to all employees to raise awareness, and regular training reinforces these principles. The Entity's Code of Conduct also addresses these requirements and is available at: https://www.nbxus.com/uploads/files/ASI20260623/1.3.pdf
10.7a-d Remuneration	Conformance	The Entity has developed a clearly defined wage structure, with basic wages exceeding the local legal minimum. Overtime compensation complies with legal requirements, and mandatory allowances support Workers' essential needs. All employees have been enrolled in the mandatory social insurance programme. Wages are paid promptly by bank transfer on the 25th of the following month and properly documented. Detailed information on wages, allowances, Overtime, and deductions is accessible through the internal system.
10.8a-c Working Time	Minor Non-Conformance	Most production workshops operate on a three-shift, four-team rotation system: 08:00–16:00, 16:00–00:00, and 00:00–08:00. Office staff work from 08:00 to 17:00, Monday to Friday, totalling 40 hours per week. Working hours are monitored, and monthly Overtime for all Workers remains within legal limits, with one rest day per week. It was identified that approximately one percent of Workers, however, exceeded an average of eight hours per day over the past six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights and promotes cooperation and communication across all production plants. It also complies with applicable national laws and regulations in China.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, maintained, and continually improved its Occupational Health & Safety (OH&S) Management System, with all sites holding valid ISO 45001:2018 Certifications. Site observations, document reviews, and management and Worker interviews indicate that the OH&S Management System has been implemented.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically reviews its OH&S Management System through monthly safety meetings, annual legal compliance evaluations, internal audits against ISO 45001:2018, and management review meetings. When control gaps are identified, the Entity assesses the need for corrective or preventive actions. The OH&S Management System includes both leading and lagging indicators. Comparative performance analysis against peer Businesses and leading practices is available in the Entity's Sustainability Report at: https://www.nbxus.com/uploads/files/ASI20260623/6.2-1.pdf
11.2 Employee engagement on Health and Safety	Conformance	All OH&S concerns and suggestions raised by Workers, as recorded in the Complaint Register and through Worker feedback, have been

CRITERION	RATING	COMMENT
		investigated, analysed, and addressed as necessary. The Health and Safety Committee, including Worker representatives, meets quarterly to review these matters and take appropriate action where needed.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 January 2025	Certification Audit – Full Certification
1	13 August 2026	Surveillance Audit