

ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**GRÄNGES
ALUMINIUM
(SHANGHAI) CO., LTD.**

CERTIFICATE
NUMBER

36

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

11 JULY 2022

DATE OF EXPIRY

10 JULY 2025

CERTIFIED SINCE

11 JULY 2019

AUTHORISED BY

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

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

Gränges Aluminium (Shanghai) Co., Ltd. is a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China. The Entity produces aluminium foils, strips, sheets, and folded tubes.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Gränges Aluminium (Shanghai) Co., Ltd.
CERTIFICATION SCOPE	Gränges Aluminium (Shanghai) Co., Ltd. is a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China. The Entity produces aluminium foils, strips, sheets, and folded tubes.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• 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 (10 – 11 June 2019)• Surveillance Audit (13 – 15 January 2021)• Re-Certification Audit (7 July – 8 July 2022)• Surveillance Audit (8 – 10 January 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 10 – 11 June 2019 (Initial Certification Audit)• 13 – 15 January 2021 (Surveillance Audit)• 7 – 8 July 2022 (Re-Certification Audit)• 8 – 10 January 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 19 June 2019 (Initial Certification Audit)• 9 March 2021 (Surveillance Audit)• 20 July 2022 (Re-Certification Audit)• 19 February 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 11 June 2019)</u></p> <p>The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses

-
- Semi-Fabrication
 - Material Conversion (Production and Transformation)

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

Surveillance Audit (13 – 15 January 2021)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Re-Certification Audit (7 – 8 July 2022)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Surveillance Audit (8 – 10 January 2024)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- 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

11 July 2022 – 10 July 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

10 July 2025

CERTIFICATE
NUMBER

36

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a Policy and process for legal Compliance management to identify and evaluate Applicable Laws, regulations, and requirements related to its operational activities such as business operations, environment, health, safety (EHS), and labour. Compliance assessments are conducted annually.
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Policies and processes, including training to identify and prevent Corruption. The Entity works against Corruption in all its forms, including Extortion and Bribery, and is consistent with Applicable Law and prevailing international standards.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct with principles related to environmental, social and governance performance. The Entity has implemented measures that include training and communication to raise awareness of the Code among business partners and suppliers.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has developed and implemented systems, procedures and processes which cover the Environmental, Social, and Governance Policies requirements. Further information is available at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/1-labor-and-business-ethics-policy.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement of its Environmental, Social and Governance-related Policies and demonstrates its commitment and support to the implemented Policies providing sufficient resources for regular review.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity makes its Policies available to internal and external Stakeholders through both internal training and via the website: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/1-labor-and-business-ethics-policy.pdf

CRITERION	RATING	COMMENT
		<p>policies/01.-local-policies/1-labor-and-business-ethics-policy.pdf.</p> <p>Employees are provided training on the Policies and the relevant requirements.</p>
2.2 Leadership	Conformance	The Entity has nominated a Senior Management Representative with the responsibility and authority for each department. Key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has identified and assessed social and Occupational Health and Safety (OH&S) impacts. And established and implemented management provisions to prevent and/or mitigate these impacts.
2.4 Responsible Sourcing	Conformance	The Entity has developed a Purchasing Policy and communicates to all suppliers and contractors and covers the Material environmental, social and governance aspects regarding suppliers.
2.5 Impact Assessments	Conformance	The Entity has implemented a procedure to identify and assess social, environmental, OH&S risks and governance and has established relevant control measures. There have been no New Projects or Major Changes to existing nominated Facilities since the last Audit.
2.6 Emergency Response Plan	Conformance	The Entity maintains valid certifications for both ISO 14001:2015 and ISO 45001, underscoring its commitment to environmental management and OH&S. In an effort to foster a collaborative approach, the Entity has developed robust Emergency Response Plans in conjunction with potentially impacted Stakeholders such as Local Communities, Workers, their representatives, and relevant agencies. These emergency response strategies, which encompass social, OH&S, and environmental incidents, are not only well-executed but also paired with comprehensive training for all personnel.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment in accordance with the ASI Performance Standard.

CRITERION	RATING	COMMENT
		There have been no mergers and acquisitions since the Entity commenced operations in 2002.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning, and divestment in accordance with the ASI Performance Standard. There have been no identified closure, decommissioning, and divestment activities since the Entity started operations in 2002.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Gränges Group's Annual and Sustainability Report for 2022 has been published on their website. The report covers key performance indicators for the Gränges Shanghai plant, including Human Rights indicators, environmental, health and safety indicators, accident rates, interactions with the local community, and legal compliance information provided by the local environmental protection bureau.</p> <p>The group report can be accessed at: https://www.granges.com/globalassets/05.-investerare/04.-rapporter-och-presentationer/2023/02-annual-report-2022/granges-annual-and-sustainability-report-2022.pdf</p>
3.2 Non-compliance and liabilities	Conformance	The Entity has received six environment related non-conformances issued by the local authority in 2022, the non-conformances are publicly disclosed on relevant government agencies and Non-Government Organisations (NGOs) websites and not by the Entity. The Entity has since corrected all non-conformances.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has listed payments to governments in its financial report which is audited by a third party.
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	The Entity has implemented an internal and external 'whistleblowing' complaints and grievance mechanisms (e.g., hotline, mail, suggestion box etc.). Contact information is available at: https://www.granges.com/contact

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has diligently carried out and recorded an environmental Life Cycle Assessment (LCA), providing a detailed and comprehensive cradle-to-gate analysis. This LCA assesses the environmental impact at various production stages, as well as the end-of-life recycling of products with a comprehensive overview of the environmental implications of the product's lifecycle. The report is available at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/4-lifecycle-assessment-of-cladded-aluminium-strip-used-in-heat-exchanger.pdf</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity's environmental Life Cycle Assessment (LCA) report is available externally upon request. There are no requests to date. The LCA report is available at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/4-lifecycle-assessment-of-cladded-aluminium-strip-used-in-heat-exchanger.pdf</p>
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The Entity has published information on the LCA on its website at: https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg.</p> <p>However, it was identified impacts of Discharges to Water and hazardous solid waste disposal are not addressed in the LCA and there was no rationale provided in the LCA as to why it was not addressed, nor publicly disclosed.</p>
4.2 Product design	Conformance	<p>The Entity has developed and implemented a Research and Design (R&D) procedure where environmental impacts are considered. Targets for energy consumption, waste reduction and recycling are defined for each Product in a Technical Confirmation Form.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has developed and implemented a 100% target utilisation rate for Process Scrap. All composite materials are also re-used. The re-use target for 2022-2023 is 65%. The remaining scrap is sold to suppliers for other purposes. The Entity has achieved a re-use rate of 75.8% in 2022 and 80.6% in 2023.</p>

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented a classification rule for Aluminium Process Scrap. Process scrap is separated, identified, and stored for recycling based on the concentration of several chemical elements.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established a three-year strategy for the utilisation of recycled materials, with the goal of achieving an annual usage of recycled Aluminium accounting for 30% of the total raw materials by 2025. In 2023, 60% of the newly developed products incorporate recycled Aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	In China, there are no complete local, regional, or national collection and recycling systems for Aluminium scrap. As a result, the Entity collaborates with customers to increase recycling rates. The Entity uses commercial scrap collectors.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity monitors, calculates and documents its major Scope 1 and Scope 2 Greenhouse Gases (GHG) Emissions and energy use by source on an annual basis. Its 2022 GHG Emissions are available at:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/5-carbon-emission-and-energy-consumption-and-target.pdf.</p> <p>The GHG emissions report was prepared in accordance with the 'Accounting and Reporting Method for Greenhouse Gas Emissions in the Nonferrous Metal Industry in Shanghai' and was verified by a third-party organisation in September 2023.</p>
5.2 GHG emissions reductions	Conformance	<p>The Gränges Group has implemented a GHG Emissions reduction target towards 2025. Gränges Asia must reduce emissions by 25% based on the levels in 2017, aligning with the assigned group target. The main strategy is to reduce unnecessary electricity consumption and increase the scrap recycling rate. The GHG Emissions target is available at:</p> <p>https://www.granges.com/sustainability/strategy-and-governance/strategy-and-targets</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	The Entity has developed and implemented an Air Emissions Management Plan which includes actions and controls to mitigate adverse impacts. The waste air generated is collected and treated before discharge. The Entity's monitoring reports for 2022 and 2023 show emissions meet the local emission standards.
6.2 Discharges to Water	Conformance	The Entity has established water reduction targets and a plan to minimise adverse impacts. Discharges to Water are covered and managed within the Environmental Management System. The monitoring reports of wastewater discharge for 2022 and 2023 indicate all major pollutants were monitored and abide by the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Following a risk assessment process from its environmental management system, the Entity has assessed risk areas of its operations where Spills and Leakages may contaminate air, water, and soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has undertaken an assessment and management of Spills and Leakages as defined in its Environmental Management System. Training is provided to relevant Workers and annual drills are planned and conducted for Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented a procedure for the disclosure of information relating to the reporting of Spills and Leakage. No Spills or Leakage occurred during 2022 or 2023.
6.4b Reporting of Spills (regular reporting)	Conformance	Whilst there have been no Spills or Leakage that have occurred since 2019, the Entity reports on Spills and Leakages and any remediation actions required, where applicable.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is managed in compliance with legal requirements.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the quantities of regular industrial waste, sanitary waste and Hazardous Waste generated by the Entity at: https://mp.weixin.qq.com/s/M7HXscVvXE5IK81jJCMdpA
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity complies with local legal regulations regarding the transfer of Dross. In China, Dross is classified as Hazardous Waste and must be transferred to licensed suppliers authorised by the Environmental Protection Bureau for proper disposal. It is not allowed to be transferred to other suppliers. Additionally, the Entity maximises Aluminium recovery through the establishment of a new Aluminium Dross recycling Facility. In 2023, a total of 1,050 tonnes of Aluminium were successfully recovered through the Aluminium Dross recycling Facility.

CRITERION	RATING	COMMENT
6.8b Dross (recycling)	Conformance	The Entity has established an Aluminium Dross recovery system, where all the recovered Aluminium is reintroduced into the production process. The treated Dross is classified as Hazardous Waste and is transferred to suppliers authorised by the Environmental Protection Bureau for proper disposal. The handling and recycling of the Dross is the responsibility of the suppliers.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable, as the Entity is not required to consider potential alternatives for landing of Dross residues, it is the responsibility of the licensed supplier(s) to consider alternatives to landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has conducted a water balance analysis to map its water withdrawal and use, its Water source is the municipal water supply. The Entity has a permit granted by the government agency for Water Discharge into the public drainage system.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments within its Area of Influence. Due to the nature of the Product and production processes, water-related risks are identified as low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, the Entity has identified there are no significant water-related risks in its Area of Influence. It holds a valid ISO 14001:2015 certificate and follows local legal requirements. The control measures for wastewater discharge are established and implemented.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, the Entity has identified that there are no significant water-related risks in its Area of Influence. The Entity monitors its wastewater discharge according to the requirements in the pollutant discharge permit.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage and risk assessment report at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/7-usage-condition-and-risk-assessment-of-water.pdf

CRITERION	RATING	COMMENT
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a biodiversity assessment as part of its Environmental Management System. The Entity is not located within, or adjacent to any Protected Areas. The Entity has identified very low risks or impacts from its operations on biodiversity. The biodiversity risk assessment is available at: https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/01.-local-policies/8-biodiversity-risk-assessment.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Criterion is not applicable as there were no identified Significant Risks and impacts on biodiversity in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Criterion is not applicable as there were no identified Significant Risks and impacts on biodiversity in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	The Criterion is not applicable as there were no identified Significant Risks and impacts on biodiversity in the Entity's Area of Influence.
8.3 Alien Species	Conformance	The Entity has identified that wooden pallets may bring Alien Species to the environment. All pallets undergo fumigation to avoid the introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity's ASI Policy states its commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Due Diligence process to identify and assess the risks and impacts on Human Rights in existing supply chains. The requirements of ASI standards are communicated to suppliers, the major supplies are identified, and social audits are conducted on most major suppliers to verify their compliance status against ASI standards. No significant non-conformities have been identified in these audits.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a complaint and grievance mechanism for Stakeholders. A remediation process for any identified adverse Human Rights impact has been implemented. No major impacts have been reported.
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Entity has implemented an Equal Employment Opportunity Policy which has been communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories, and resources in its Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories, and resources in its Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage values identified in its Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, the lands where they operate are purchased from the local government where no resettlements were required. However, the Entity has established a management procedure for resettlements and does not have expansion plans that would require resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, the lands where they operate are purchased from the local government where no resettlements were

CRITERION	RATING	COMMENT
		required. The Entity does not have do not have expansion plans that would require resettlements.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established and implemented control measures for identified impacts on Local Communities. There are no complaints from the Local Communities. The Entity is active in community engagement and has a positive impact on Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has established and implemented control measures to identify impacts on Local Communities. The Entity is active in community engagement and provides a positive impact on communities. There have been no complaints received from the Local Community.
9.7c Local Communities (livelihoods)	Conformance	The Entity has taken a proactive approach to working with the Local Community and neighbourhood organisations to improve and support mutual interests. The Entity has a good relationship with the Local Community and is active in community engagement.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established a management procedure that prohibits the use of conflict minerals and materials from Conflict-Affected and High-Risk Areas. This procedure has been communicated to the Entity's suppliers and customers.
9.9 Security practice	Conformance	The Entity has implemented a service agreement between the Entity and the security company regarding the labour contracts of security Workers, which clearly defines the primary role of security Workers to protect people, property, and assets and to respect Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	In China, some laws restrict the Freedom of Association. However, the Entity has demonstrated they respect the right to Freedom of Association and Collective Bargaining. There is a trade union with five freely elected committee members. All employees are free to join the trade union.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	In China, some laws restrict Collective Bargaining. However, a Collective Bargaining agreement is in place at the Entity and is reviewed and renewed annually.

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	In China, some laws restrict Freedom of Association and Collective Bargaining. However, there is a trade union present at the Entity. Committee members of the trade union can deal with Workers' concerns with management on their behalf.
10.2a Child Labour (minimum age)	Conformance	The Entity has developed and implemented a Policy prohibiting the use of Child Labour. There is no presence of Child Labour or young Workers identified at the Entity.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. There is no presence of Child Labour or young Workers in the Entity.
10.2c Child Labour (worst forms)	Conformance	The Entity commits itself and communicates with its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a Policy for the prohibition of Forced Labour, including Human Trafficking and suppliers are required to follow the Policy. There are no reports of Forced Labour in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not engage in nor support Forced Labour. All employees are directly hired and are not required to pay fees or deposits in any form.
10.3c Forced Labour (migrant workers)	Conformance	There is no presence of foreign Migrant Workers employed by the Entity. All Workers are Chinese nationals.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not engage nor support Forced Labour and does not provide loans to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict the freedom of Workers' movement to and from the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original documents of Workers, copies of original documents are kept in Workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny the freedom of Workers to terminate their employment. Workers can announce the termination of their employment 30 days in advance or one day within the probation period in line with Labour Contract Law.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. Decisions in hiring, employment (such as compensation, promotion, access to training, etc.), or the termination of Workers are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics. Relevant training courses are provided to all employees. There are no cases of Discrimination have been reported.
10.5 Communication and engagement	Conformance	The Entity has implemented operating procedures to ensure open communication and direct engagement with Workers regarding working conditions, and resolution of workplace and compensation issues without the threat of reprisal, intimidation, or harassment.
10.6 Disciplinary practices	Conformance	The Entity has implemented disciplinary measures that follow legal requirements and require the confirmation of the involved Worker(s). The Entity does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity's wage structure is clearly defined with the basic wage being over the legal minimum wage. The total payment meets Workers' basic requirements.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid timely to all Workers by bank transfer around the 10 th of the following month.
10.8 Working Time	Conformance	The Entity has developed a management procedure covering working hours, Overtime work and the control of Overtime. Working hours are recorded and monitored in compliance with local Labour Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy which is reviewed periodically and communicated to Stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's OH&S Policy applies to all Workers and Visitors in compliance with legal requirements and the requirements of ISO 45001:2018 certification.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented systems to identify and evaluate its compliance status to all applicable legal requirements and other related requirements.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity provides training courses to Workers to understand the hazards, OH&S risks and actions that are relevant to them. Workers know of their right to refuse unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented OH&S Management System and holds a valid ISO 45001:2018 certificate. However, it was identified that the Entity has not taken corrective actions regarding the excessive noise levels in certain job positions within the workshop area.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a system for Workers' consultation and participation in health and safety. Worker representatives participate in weekly health and safety meetings where Management responds to the concerns and advice on OH&S issues from Workers.
11.4 OH&S performance	Conformance	The Entity has documented and implemented health and safety targets and improvements as part of its OH&S program. The status of these targets is monitored monthly.

Document Control and Version History

Revision	Date	Notes
0	11 July 2019	Initial Certification Audit - Full Certification
1	29 March 2021	Surveillance Audit - Update 'certificate presented to' to reflect Entity Name in full
2	16 August 2022	Re-Certification Audit – Full Certification
3	27 February 2024	Surveillance Audit