

---

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](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

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"><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (10 – 11 June 2019)</li><li>• Surveillance Audit (13 – 15 January 2021)</li><li>• Re-Certification Audit (7 July – 8 July 2022)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 10 – 11 June 2019 (Initial Certification Audit)</li><li>• 13 – 15 January 2021 (Surveillance Audit)</li><li>• 7 – 8 July 2022 (Re-Certification Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 19 June 2019 (Initial Certification Audit)</li><li>• 9 March 2021 (Surveillance Audit)</li><li>• 20 July 2022 (Re-Certification Audit)</li></ul>
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"><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul>

---

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.

---

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

Surveillance Audit

---

NEXT AUDIT  
DUE DATE

10 July 2024

---

CERTIFICATE  
NUMBER

36

---

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard legal compliance requirements. The Entity maintains awareness of and ensures compliance with Applicable Law and annually conducts a compliance evaluation.
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: <a href="http://mp.weixin.qq.com/s/jYY1QV6JEeNslr0QS78PUQ">http://mp.weixin.qq.com/s/jYY1QV6JEeNslr0QS78PUQ</a>
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)	Minor Non-Conformance	The Entity makes its Policies available to internal and external Stakeholders through both internal training and via the website: <a href="http://mp.weixin.qq.com/s/jYY1QV6JEeNslr0QS78PUQ">http://mp.weixin.qq.com/s/jYY1QV6JEeNslr0QS78PUQ</a> However, it was identified the Entity did not communicate the Policies effectively as training was not provided to twenty-three new Workers who joined the Facility after June 2019.

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated a Senior Management Representative with the responsibility and authority of 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	Minor Non-Conformance	The Entity has implemented a procedure to identify and assess social, environmental, OH&S risks and governance and has established relevant control measures. It was identified the Entity did not conduct its risk assessment on labour and business ethics and was not updated annually according to an internal Policy requirement. The last update was undertaken in 2019.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001 certificates. The Entity has well-established emergency response plans developed in collaboration with potentially affected Stakeholder groups such as communities, Workers and their representatives, and relevant agencies. Emergency Response Plans relating to Social, Occupational Health and Safety (OH&S) and Environmental Accidents are well implemented, and personnel are trained.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment in accordance with the ASI Performance Standard. There were no mergers and acquisitions since the Granges Aluminium (Shanghai) Co., Ltd started operations in 2002.

CRITERION	RATING	COMMENT
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 has been no identified closure, decommissioning, and divestment activities since the Entity started operations in 1996.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its key performance indicators within its 2021 Annual and Sustainability report covering Human Rights, Environmental, Health and Safety (EHS), number of accidents, interactions with the local Community, and legal compliance information from the local Environment Protection Bureau: <a href="https://mp.weixin.qq.com/s/XxjDcqO8z4C9Vd5bUfCbKQ">https://mp.weixin.qq.com/s/XxjDcqO8z4C9Vd5bUfCbKQ</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has received three environment related non-conformances issued by the local authority in 2021, the non-conformances are publicly disclosed on relevant government agencies and Non-Government Organisations (NGOs) websites and not by the Entity. The Entity has 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.).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted and documented an environmental Life Cycle Assessment (LCA). The LCA has cradle-to-gate information where the impact of the various production stages and end-of-life recycling of products are assessed. The report is available at: <a href="https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg">https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's environmental Life Cycle Assessment report is available externally upon request. There

CRITERION	RATING	COMMENT
		<p>are no requests to date. The LCA report is available on:  <a href="https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg">https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg</a></p>
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The Entity has published information on the LCA on its website:  <a href="https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg">https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg</a>. Impacts of Discharges to Water and hazardous solid waste disposal are not addressed in the LCA. There was no rationale provided in the LCA as to why it was not covered nor publicly disclosed.</p>
4.2 Product design	Conformance	<p>The Entity has developed and implemented Research and Design (R&amp;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 is 65%. The remaining scrap is sold to suppliers for other purposes. The Entity has achieved a re-use rate of 68.5% in 2021.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>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.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has established a three-year recycling strategy and collaborates with customers to improve the recycling rate at end-of-life.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>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.</p>
<b>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</b>		
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 2021 GHG Emissions are available at:</p>

CRITERION	RATING	COMMENT
		<a href="https://mp.weixin.qq.com/s/Pn2qcmEXLBYh57u0_65wLA">https://mp.weixin.qq.com/s/Pn2qcmEXLBYh57u0_65wLA</a> The GHG Emissions are not verified by a Third Party.
5.2 GHG emissions reductions	Conformance	The Gränges Group has implemented a GHG Emission 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: <a href="https://mp.weixin.qq.com/s/Pn2qcmEXLBYh57u0_65wLA">https://mp.weixin.qq.com/s/Pn2qcmEXLBYh57u0_65wLA</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has 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 2021 and 2022 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 2021 and 2022 indicate all major pollutants were monitored and achieved 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



CRITERION	RATING	COMMENT
		its Environmental Management System. Training is provided to relevant Workers and conducted the annual drill when an oil Leakage occurs.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented a procedure for the disclosure of information regarding the reporting of Spills and Leakage. No Spills or Leakage occurred during 2021 or 2022.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has an Environment, Health, and Safety (EHS) Emergency Preparedness and Response Management Procedure, which requires the Entity to report Spills and Leakage and remediation actions. No Spills or Leakage occurred in 2021 or 2022.
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.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the quantities of regular industrious waste, sanitary waste and Hazardous Waste generated by the Entity for 2021: <a href="https://mp.weixin.qq.com/s/M7HXscVvXE5IK81jJCMdpA">https://mp.weixin.qq.com/s/M7HXscVvXE5IK81jJCMdpA</a>
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.

CRITERION	RATING	COMMENT
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 adheres to local legal requirements as per the transfer records of Dross. In China, Dross is classified as Hazardous Waste, it must be transferred to the supplier(s) licensed by Environment Protection Bureau for disposal and cannot be transferred to other suppliers.
6.8b Dross (recycling)	Conformance	Dross is classified as Hazardous Waste. It is transferred to licensed suppliers for its disposal by the Environment Protection Bureau. The supplier(s) manages Dross treatment and recycling.
6.8c Dross (review of alternatives)	Not Applicable	The Entity is not required to review potential alternatives as it is the responsibility of licensed supplier(s) to review alternative options for 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 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 in the local water environment, water-related risks are low.
7.2a Water management (management plans)	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	The Entity has identified that there are no significant water-related risks in its Area of Influence. The Entity monitors its wastewater

CRITERION	RATING	COMMENT
		discharge per 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: <a href="https://mp.weixin.qq.com/s/X5JqsVgXImHNZidwCHJsaw">https://mp.weixin.qq.com/s/X5JqsVgXImHNZidwCHJsaw</a>
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: <a href="https://mp.weixin.qq.com/s/m0jMwvASaqT8loQDOLUMVA">https://mp.weixin.qq.com/s/m0jMwvASaqT8loQDOLUMVA</a>
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		

CRITERION	RATING	COMMENT
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.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has established a Due Diligence process to identify and assess the risks and impacts on Human Rights in existing supply chains. Social audits are conducted to verify compliance with the ASI Performance Standard. However, it was identified on-site social and human rights audits of service providers (e.g., security services, food service providers and cleaning company) were not conducted based on an internal process once every two years.
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 does not apply 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 does not apply 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 does not apply 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	The Entity has established a management procedure for resettlements. The lands are purchased from the local government by the Entity. There are no expansion plans, and no resettlements have occurred.

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a management procedure for resettlements. There are no plans for expansion and no resettlements have occurred.
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 is 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.

CRITERION	RATING	COMMENT
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.
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	There is no presence of child labour or young Workers identified at the Entity. This was confirmed by the youngest worker identified on-site during the audit was born on 24 June 1999 and joined the company on 15 June 2021.
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 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.

CRITERION	RATING	COMMENT
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.
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, 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 which 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 <sup>th</sup> 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

CRITERION	RATING	COMMENT
		reviewed periodically and communicated to Stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health & Safety Policy applies to all Workers and Visitors in compliance with legal requirements and the requirements of ISO 45001:2018 certification.
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 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 not all new employees had participated in fire escape drills, such as completing emergency evacuation training within one year after joining.
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