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ASI CERTIFICATION  
PERFORMANCE  
STANDARD

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PRESENTED TO

# GRÄNGES ALUMINIUM (SHANGHAI) CO., LTD.

CERTIFICATE  
NUMBER

36

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

11 JULY 2019

DATE OF EXPIRY

10 JULY 2022

CERTIFIED SINCE

11 JULY 2019

AUTHORISED BY

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

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](http://www.aluminium-stewardship.org)*

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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 strips and plates, used for the auto industry.

# 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 strips and plates, used for the auto industry.
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></ul>
AUDIT FIRM	DNV GL
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></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></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> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (13 – 15 January 2021)</u></p>

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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.

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

11 July 2019 – 10 July 2022

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

10 July 2022

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CERTIFICATE  
NUMBER

36

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Gränges Aluminium (Shanghai) Co., Ltd. has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Gränges Aluminium (Shanghai) Co., Ltd. has systems in place to maintain awareness of and to ensure compliance with applicable law, and conducts the compliance evaluation on an annual basis.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent corruption are well implemented. Training courses are provided to all employees. The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards.
1.3 Code of Conduct	Conformance	A Code of Conduct which covers social, governance and environment performance principles is established. The policies and the associated management procedures against ISO 14001 and ISO 45001 cover the implementation of management requirements on environment and occupational health and safety. The Code of Conduct is available for all interested stakeholders on the official website of the Entity: <a href="https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2018.pdf">https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2018.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Management Policies are consistent with the environmental, social, and governance practices, and published on the Entity's office website: <a href="https://mp.weixin.qq.com/s/rbFPNMzbUkkUyVeNS8KlxA">https://mp.weixin.qq.com/s/rbFPNMzbUkkUyVeNS8KlxA</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented policies, endorsement and support to provide sufficient resources for regular review of policies, therefore meeting the ASI Performance Standard requirements.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, publishing on website and posts on-site. More detailed information, please see: <a href="https://mp.weixin.qq.com/s/kyiNx7R_GQQ7_Tez7hf-g">https://mp.weixin.qq.com/s/kyiNx7R_GQQ7_Tez7hf-g</a>
2.2 Leadership	Conformance	Two senior management representatives have been nominated. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Gränges Aluminium (Shanghai) Co., Ltd. has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The scope of this external certification covers the Entity's entire Certification Scope.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity establishes, implements and maintain the Social Management System against ASI Performance Standard and holds a valid ISO 45001:2018 certificate.
2.4 Responsible Sourcing	Conformance	The Purchasing Policy is communicated to all suppliers and contractors and cover the environmental, social and governance aspects towards the suppliers, based on the ASI Performance Standard. Please see: <a href="https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/180619_granges-supplier-coc.pdf">https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/180619_granges-supplier-coc.pdf</a>
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are well implemented at each department. The identified risks on social, environment, occupational health & safety (OH&S) and governance are assessed, and the associated control measures are established and implemented. There have not been any new projects or major changes since the initial audit.
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected stakeholder groups, the Emergency Response Plans are established, well implemented and workers are trained on them.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since the Entity started to operate in 1996.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment is established in accordance to the requirement of ASI Performance Standard. But no such case has happened since the Entity started to operate in 1996.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability Report is published on the official website of the Entity: <a href="https://www.granges.com/globalassets/05.-investerare/04.-rapporter-och-presentationer/2020/02.-annual-report-2019/granges_ar19_eng.pdf">https://www.granges.com/globalassets/05.-investerare/04.-rapporter-och-presentationer/2020/02.-annual-report-2019/granges_ar19_eng.pdf</a>
3.2 Non-compliance and liabilities	Conformance	No non-compliance or liabilities were recorded in the 2019 Sustainability Report. Per the official websites of the relevant government agencies and NGOs, one correction notice was raised by the local Environment Protection Bureau in June 2020. The Entity has taken the associated investment and action to solve the problems and has disclosed the cases: <a href="https://mp.weixin.qq.com/s/NgVKAIKDtzJpC3pPSDc7NA">https://mp.weixin.qq.com/s/NgVKAIKDtzJpC3pPSDc7NA</a>
3.3a Payments to governments (legal and contractual)	Conformance	Per the financial audit report, as verified by a third party audit firm in 2020, payments to government by the Entity are only those legally required. No other payments are made.
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	Internal and external whistle-blowing/ complaint/ grievance mechanism exist (e.g. whistle-blowing mail address, suggestion box) and published on: <a href="https://www.granges.com/about-granges/corporate-governance/whistleblower">https://www.granges.com/about-granges/corporate-governance/whistleblower</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	An environmental Life Cycle Assessment (LCA) has been conducted and is documented. The LCA is cradle-to-gate, where the impact of the various production stages and end-of-life recycling is assessed. The report is published on:

CRITERION	RATING	COMMENT
		<a href="https://mp.weixin.qq.com/s/Q_nTkTgodWNCtnp_gjiDT3A">https://mp.weixin.qq.com/s/Q_nTkTgodWNCtnp_gjiDT3A</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The environmental Life Cycle Assessment report can be provided by external communication if required. There have been no requests to date. The LCA report is published on:</p> <a href="https://mp.weixin.qq.com/s/S91MSk5xZ10ujGYrsTnP6A">https://mp.weixin.qq.com/s/S91MSk5xZ10ujGYrsTnP6A</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The LCA information is published on the Entity's website:</p> <a href="https://mp.weixin.qq.com/s/S91MSk5xZ10ujGYrsTnP6A">https://mp.weixin.qq.com/s/S91MSk5xZ10ujGYrsTnP6A</a>
4.2 Product design	Conformance	<p>Following the Research and Design (R&amp;D) procedure, the environmental impacts are taken into consideration. The target for the energy-consumption and waste reduction and recycling are defined in the Technical Confirmation Form for each product.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The targets for utilization rate of the process scrap is 100%. Composite material is reused by the Entity. The target in 2021 is 60%. The others are sold to the suppliers for other purposes. The achieved reuse rate in 2020 was 58.3%.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Per the classification rule for scrap and site observation, the process scraps are separated, identified and stored for recycling based on the concentration of the chemical elements.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has a clear recycling strategy, working 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>Because there is not the complete local, regional or national collection and recycling systems for aluminium scraps in China, the Entity works with customers to increase recycling rates. The Entity uses some commercial scrap collectors currently.</p>
<b>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</b>		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The major Scope 1 and 2 greenhouse gas emissions and energy use by source are tracked, calculated and documented annually. 2019 GHG emissions are published on:</p>

CRITERION	RATING	COMMENT
		<a href="https://mp.weixin.qq.com/s/-UmuL6NopGXOUFqUxycy-pw">https://mp.weixin.qq.com/s/-UmuL6NopGXOUFqUxycy-pw</a> The GHG emission is not checked by a third party.
5.2 GHG emissions reductions	Conformance	The Gränges Group set up a GHG emission reduction target towards 2025 and Gränges Asia should reduce emissions by 25% based on the level of 2017, aligning with the assigned group target. The main strategy is to reduce the unnecessary electricity consumption and increase the scrap recycle rate. The GHG emissions target is published on: <a href="https://mp.weixin.qq.com/s/wuXUDcQMSQ1siKChF9Y2EA">https://mp.weixin.qq.com/s/wuXUDcQMSQ1siKChF9Y2EA</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 waste air generated in the operation is collected and treated before discharge. The Entity has developed and implemented an Air Emissions Management Plan with actions/controls to mitigate adverse impacts. Per the monitoring reports in 2019 and 2020, emissions meet the local emission standards.
6.2 Discharges to Water	Conformance	Discharges to water is covered and managed within the Environmental Management System. The Entity has set water reduction targets and establish a related plan to minimize adverse impacts. The monitoring reports of wastewater discharge in 2019 and 2020 indicate all major pollutants were monitored, and results for these major pollutants meet the local legal discharge limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where spills and leakage may contaminate air, water and soil is done by following the risk assessment process of environmental management system.



CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of spills and leakage is defined in the Environmental Management System. Major spills and leakages will be handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of spills and leakage is defined in Management Procedure of Information Disclosure. No spills or leakage occurred during 2019 or 2020.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of spills and leakage and remediation actions taken are published in the annual Sustainability Report. However, no spills or leakage occurred in 2019 or 2020.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system. The Entity implemented a waste management strategy according to the waste mitigation hierarchy. The disposal of hazardous waste is compliance with the legal compliance.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals information on: <a href="https://mp.weixin.qq.com/s/k1uqTmAelK4CMx6a nrKkcg">https://mp.weixin.qq.com/s/k1uqTmAelK4CMx6a nrKkcg</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 Aluminium metal taken from the dross pressing is recycled into the melting furnaces of the Entity. The remaining part is sold to external dross processors for further extraction of the remaining aluminium, which can be used to produce aluminium alloying ingots.
6.8b Dross (recycling)	Conformance	The Aluminium metal taken from the dross pressing is recycled into the melting furnaces of the Entity. The remaining part is sold to external dross processors for further extraction of the remaining aluminium, which can be used to produce aluminium alloying ingots.
6.8c Dross (review of alternatives)	Conformance	The company reviews the internal dross processing method and dross sales channel on yearly basis. Nothing is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The water risk assessment considered the Entity's areas of influence. Due to the nature of the product and production processes, in the local water environment, the level of water-related risk is low.
7.2a Water management (management plans)	Not Applicable	There were no identified significant water related risks in the Entity's area of influence.
7.2b Water management (monitoring)	Not Applicable	There were no identified significant water related risks in the Entity's area of influence.
7.3 Disclosure of water usage and risks	Conformance	The water usage and risks assessment report is published on: <a href="https://mp.weixin.qq.com/s/8DHGj4qDc9C_3trerCIDNg">https://mp.weixin.qq.com/s/8DHGj4qDc9C_3trerCIDNg</a>

CRITERION	RATING	COMMENT
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System. The Entity is not in, or close to, any protected area. The risk or impact by the operation of the Entity on biodiversity is very low. For further information please see: <a href="https://mp.weixin.qq.com/s/iWoJi6x45Iig-hKG3qplQQ">https://mp.weixin.qq.com/s/iWoJi6x45Iig-hKG3qplQQ</a>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	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	There were no identified significant risks and impacts on biodiversity in the Entity's area of influence.
8.2c Biodiversity management (reporting)	Not Applicable	There were no identified significant risks and impacts on biodiversity in the Entity's area of influence.
8.3 Alien Species	Conformance	The main carrier medium (pallets which is wood) is processed in a way 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 Human Rights and Business Ethics Policy establishes the commitment to respect human rights. The commitment statement is posted in each workshop and canteen. An associated training course is provided to all employees. There was no negative information on human rights found on the internet.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect human rights. The due diligence process is established, covering

CRITERION	RATING	COMMENT
		the supply chain. All major suppliers were audited against relevant requirements of the ASI Performance Standard in 2019 and 2020.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity establishes and publishes the complains/grievance channel to stakeholders. No major adverse impact was reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.
9.3 Indigenous Peoples	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples are established. No Indigenous Peoples are involved.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) are established. No Indigenous Peoples are involved.
9.5 Cultural and sacred heritage	Not Applicable	Policies and procedures to protect cultural and sacred heritage are established, however, there are no cultural and sacred heritage values in the area of the influence of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on resettlements. There are no Indigenous Peoples in the area of influence of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established procedure on resettlement. There are no Indigenous Peoples in the area of influence. Resettlement is not required.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaint from the local communities was received.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local communities are established and implemented. No complaint from the local communities was received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with local communities. Most employees are from local communities. The Entity provides charitable donations to local kindergartens.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not using conflict minerals and communicates this through the aluminium value chain. The due diligence analysis indicates no conflict minerals are used, and no materials are from the conflict-affected and high-risk areas. All suppliers sign a commitment letter stating they do not use conflict minerals. No complaint on this issue has been received.
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect human rights in line with ASI Standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity demonstrates they respect the right to Freedom of Association and to collective bargaining. There are 5 freely elected trade union committee members including one female employee.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict collective bargaining in China. Although there are no Collective Bargaining Agreements in the company, the Entity has a policy of respecting rights to Freedom of Association and collective bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws that restrict Freedom of Association and collective bargaining in China. However, the Entity demonstrates they respect the right to Freedom of Association and to collective bargaining. There is a trade union in the company. Committee members of the trade union can deal with the Workers' concerns with management on behalf of Workers.
10.2a Child Labour (minimum age)	Conformance	There is no child labour or young workers in the Entity. The youngest worker in the site during the audit was born on 31 July 1999, who joined the company on 13 January 2020.
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 not allowed to work in hazardous working conditions. The youngest worker in the site during the audit was born on 31 July 1999, who joined the company on 13

CRITERION	RATING	COMMENT
		January 2020. There is no child labour or young workers in the Entity.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in China. Granges Aluminium (Shanghai) Co., Ltd commits itself, and expects its suppliers, to comply with the prohibition of child labour. The youngest worker in the site was born on 31 July 1999, who joined the company on 13 January 2020.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself, and expects its suppliers, to comply with the prohibition of forced labour, slavery and human trafficking. There are no cases of forced labour reported or heard of in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in forced labour. All employees are hired directly. Workers are not required to provide fees or deposits in any form.
10.3c Forced Labour (migrant workers)	Conformance	No foreign migrant workers in the Entity, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in forced labour and does not provide loans to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in forced labour. There is no restriction of Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in forced labour. There is no retention of original documents of workers, only copies of original documents are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in forced labour. The time for announced termination of the employment is in compliance with the Labour Contract Law (30 days in advance or 3 days in the period of probation).
10.4 Non-Discrimination	Conformance	The Entity is committed to non-discrimination. Decisions in hiring, employing (such as compensation, promotion, access to training, etc.), or terminating workers are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics. The relevant training courses are provided to all employees. No case of discrimination has been received.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	Direct and frequent communication channels with Workers and the worker representatives is established and implemented. Workers can report their concerns or complaint using mailbox, suggestion box, hotline and through the trade union. The interviewed workers knew the available channels.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, and any disciplinary measures are in compliance with legal requirements and require the confirmation of involved Worker.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, the basic wage meets the legal minimum wage. The total payment meets the workers' basic needs.
10.7b Remuneration (method of payment)	Conformance	All payment is documented and timely paid to all workers by bank transfer around 10th of the following month.
10.8 Working Time	Conformance	Working hours are recorded by finger-print scanning attendance system. The working hours of workers meet the local legal requirements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Occupational Health and Safety (OH&S) Policy is implemented, reviewed periodically and communicated with stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The health & safety policy is applied to workers and visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Health and Safety Policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the compliance status of the applicable requirements.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with the training courses to understand the hazards, OH&S risks and actions that are relevant to them and 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. The scope of the

CRITERION	RATING	COMMENT
		external certifications covers the entire certification scope. One minor Non-Conformance is issued: No evidence for the position transfer for the Worker with the relative contraindication for hearing.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of workers' consultation and participation in health & safety. Worker representatives participate at the weekly health and safety meeting periodically. The management responds to the concerns and advices on OH&S issues from workers.
11.4 OH&S performance	Conformance	Health and safety targets and improvements are documented in occupational health and safety program. The associated management plans are established and implemented. The achievement status of the targets is monitored every 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