
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

YUNNAN HONGTAI NEW MATERIAL CO., LTD.

CERTIFICATE
NUMBER

244

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

30 JANUARY 2023

DATE OF EXPIRY

29 JANUARY 2026

CERTIFIED SINCE

30 JANUARY 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

All activities of the A-Series, B-Series and C-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	China Hongqiao Group Co., Ltd.
ENTITY NAME	Yunnan Hongtai New Material Co., Ltd.
CERTIFICATION SCOPE	All activities of the A-Series, B-Series and C-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">26 – 30 September 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 November 2022
AUDIT SCOPE	<p>All activities of the A-Series, B-Series and C-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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

30 January 2023 –29 January 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

29 January 2025

CERTIFICATE
NUMBER

244

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to maintain awareness of and to ensure compliance with Applicable Law. The Code of Conduct is available at: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=1&sn=54c773eb831beb12075d71c2fcaaff1a&chksm=c1f417e1f6839ef7833cf947fb862d28995754ff396613afbbfaa9da14a47d31b2d4f864fd45&token=2069259968&lang=zh_CN#rd
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption, such as the Management Procedure of Anti-Corruption, are implemented and personnel are trained in these processes. The Entity also implements a Policy for Labour and Business Ethics: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=2&sn=01fb401be0a9b864bac6d9ac190360bb&chksm=c1f417e1f6839ef73f8f366e705560d7f60e0b83fd406a07c7671934886e5ff556c20e5b0b8d&token=2069259968&lang=zh_CN#rd
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that addresses the principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is available at: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=1&sn=54c773eb831beb12075d71c2fcaaff1a&chksm=c1f417e1f6839ef7833cf947fb862d28995754ff396613afbbfaa9da14a47d31b2d4f864fd45&token=2069259968&lang=zh_CN#rd
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented an Environmental, Social and Governance Management Policy: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=2&sn=01fb401be0a9b864bac6d9ac190360bb&chksm=c1f417e1f6839ef73f8f366e705560d7f60e0b83fd406a07c7671934886e5ff556c20e5b0b8d&token=2069259968&lang=zh_CN#rd
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrate commitment to the Policies and provide the resources for implementation.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its Environmental, Social and Governance Management Policy to internal stakeholders through training and external stakeholders via the website: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=2&sn=01fb401be0a9b864bac6d9ac190360bb&chksm=c1f417e1f6839ef73f8f366e705560d7f60e0b83fd406a07c7671934886e5ff556c20e5b0b8d&token=2069259968&lang=zh_CN#rd
2.2 Leadership	Conformance	A senior Management Representative has been nominated with the responsibility for conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System (EMS) and plans to certify the EMS to ISO14001:2015 at end of 2022.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a purchasing Policy as part of the Policy for Labour and Business Ethics, which addresses the material environmental, social and governance aspects relevant to suppliers. Refer to: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=4&sn=da284dba7858a62970a9c9598f9ef5aa&chksm=c1f417e1f6839ef7906326fcd80ceb26d5aa1dd8c9b93cccdcb861a15ba861a3f9e61c02cce&token=2069259968&lang=zh_CN#rd The Entity conducts second party due diligence audits at major next tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. However, not all major suppliers were included in the supply chain social audit process.
2.5 Impact Assessments	Conformance	The Entity was established in 2020, and as a New Project, conducted Impact Assessments on environmental, social, cultural and Human Rights, including a gender analysis. All Impact Assessment reports are registered with the local authority and communicated to affected Communities and Stakeholders. The Entity commits to conducting

CRITERION	RATING	COMMENT
		impact assessments for New Projects or Major Changes as necessary in future.
2.6 Emergency Response Plan	Conformance	The Entity has established comprehensive emergency action plans to address fire, earthquake, hazardous chemical leak, extreme weather, key equipment breakdown. Emergency Response Plans are developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and have been registered with relevant government agencies in compliance with ISO standard requirements and legal requirements. The employees are provided the relevant training courses and the exercises are conducted for fire/evacuation, chemical leak.
2.7 Mergers and Acquisitions	Conformance	The Entity respects the mergers and acquisition management procedure of the parent company and assists the Group headquarters to review environmental, social and governance issues as required. No such activity has occurred since the Entity commenced operation in 2021.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity respects the closure, decommissioning and divestment management procedure of the parent company and assists the Group headquarters to review environmental, social and governance issues as required. No such activity has occurred since the Entity commenced operation in 2021.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published an annual Sustainability Report, available at: https://mp.weixin.qq.com/s/P9nXGsxQHkvL6nBV5ZpESA
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2021 Sustainability Report: https://mp.weixin.qq.com/s/P9nXGsxQHkvL6nBV5ZpESA
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's payments to governments are listed in the financial report, which is audited by a Third Party. The Entity only makes, or have made on its behalf, payments to governments on a legal and/or contractual basis.

CRITERION	RATING	COMMENT
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 established an internal complaints and grievances reporting mechanism that includes a hotline, suggestion boxes and a grievance handling council. External complaints can be made via a whistleblowing hotline, accessible at: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=3&sn=a8dd3f3218472038b2f12b6d48586ba7&chksm=c1f417e1f6839ef75414933db331912620c2d3565f9ba4a0433b39b3ac2e0784c fbead429d5b&token=2069259968&lang=zh_CN#rd
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has compiled an environmental Life Cycle Assessment (LCA) report. The assessment covers all products (liquid aluminium and aluminium ingots) and production lines. The LCA covers environmental impacts including resource consumption, energy consumption, air emission, GHG emissions and solid waste discharge.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate LCA information on its aluminium product covering all production processes and main supporting activities, such as transportation waste disposal. A Third Party has assessed the carbon footprint for liquid aluminium and aluminium ingots. The LCA Report can be provided by external communication as required. To date, no such request has been received.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has made available its LCA Report: https://mp.weixin.qq.com/s/pKyU0nGsMQPWQ2GQT D_JYw
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established a target to recycle 100% of Aluminium Process Scrap. Scrap is generated in the casting process. As per the site observation and document review, the scrap is 100% recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	In accordance with the content analysis report and management interviews, the Entity's product is 100% aluminium and separation is not needed.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities and targets. The

CRITERION	RATING	COMMENT
		Entity communicates with the main customer to discuss how to improve the recycling rate of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no local, regional or national collection and recycling systems for aluminium scraps in China. The Entity works with the customer to decide how to improve the recycling rate of products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity has calculated its 2021 greenhouse gas (GHG) emissions using the calculation formula defined in the China National Standard and the electricity conversion factor defined by the government authority. Major Scope 1 and Scope 2 GHG emissions and energy use has been disclosed in the 2021 GHG Emissions Inventory Report: https://mp.weixin.qq.com/s/RdUjgnTZJUQPaoxL1wdSA</p> <p>There report is not verified by a Third Party. However, a minor non-conformance is raised, as given the Entity's scale and the nature of impact, the current disclosure method is not suitable and shall be more formal and reliable.</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>The China Hongqiao Group has established an overall strategy on GHG emissions reductions, including a 30% reduction in the carbon footprint by 2030 and carbon neutrality by 2050. Based on the Group strategy and the GHG emissions in 2021, the Entity established a reduction target with the primary measure to use more green electricity (hydroelectricity and solar power). The GHG emissions reduction target is disclosed at: https://mp.weixin.qq.com/s/RdUjgnTZJUQPaoxL1wdSA</p> <p>However, a minor non-conformance is raised, as given the Entity's scale and the nature of impact, the current disclosure method is not suitable and shall be more formal and reliable.</p>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has established and implemented an energy and carbon management system based on the China Hongqiao Group strategy of peak carbon in 2030 and carbon neutrality by 2050. Key performance indicators have been established for energy consumption in each production process and are monitored monthly. The energy management system conforms with ISO 50001 and the Entity is seeking certification.

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable, as whilst the Entity commenced production in October 2020, GHG emissions were not calculated due the short period of time.
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity's main energy supply is sourced from hydroelectricity (89%), significantly reducing GHG emissions. The Entity's Scope 1 and Scope 2 GHG emissions from the production of Aluminium is 2.67 tonnes CO ₂ e per metric tonne Aluminium.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has conducted an Environmental Impact Assessment to identify and quantify the Emissions to Air that have adverse effects on humans or the environment. The Entity has established the emissions treatment facilities required and the operational requirements to treat the emissions prior to release and has monitored the air emissions at the required interval. The monitoring results in 2021 and 2022 indicate emissions are lower than the legal emission limit.
6.2 Discharges to Water	Conformance	Wastewater is collected, treated and 100% reused on site (cooling processes, toilet flushing, irrigation) in accordance with the Entity's Pollutant Discharge Permit. There is no discharge to external drainage/water systems.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Based on the approved Environmental Impact Assessment report, the Entity has identified and assessed the major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. The assessment report is published at: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwO_A==&mid=2247483725&idx=2&sn=a933f0c6e8470f54cfe46f4d96c71506&chksm=c1f4177ef6839e6864c6edd88f331d8416f38dfe5f351d258630e837e57bbe051ce84a7ade40&token=1409156807&lang=zh_CN#rd
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the Emergency Response Plan for environmental incidents in which the control methods for the identified spill/leakage are defined. The required spill management facilities are in good order. The Entity has provided training on the plan to the relevant Workers and has conducted emergency drills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has defined the requirement to report Spills and Leakage in the Emergency Response Plan, which

CRITERION	RATING	COMMENT
		also addresses responsibilities and the reporting process. No Spills occurred in 2021 or 2022.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a process to ensure Impact Assessments associated with Spills and Leakages and the remedial actions taken are disclosed. No Spills or Leakage occurred in 2021 or 2022. The Entity has published the annual Environmental Performance Report 2021: https://mp.weixin.qq.com/s?_biz=MzkyMjM3MDkwOA==&mid=2247483836&idx=2&sn=a6a6fff7771d9f3d1b99ab0ab743cd44&chksm=c1f4178ff6839e99a1f92ae3444dd8b2eb12978c5fd3bfa91e818041d0cd593883e01f904890&token=1409156807&lang=zh_CN#rd
6.5a Waste management and reporting (strategy)	Conformance	The Entity has identified and quantified the waste generated in its operational processes in the approved Environmental Impact Assessment Report and Pollutant Discharge Permit. In conformance with the China Hongqiao Group's waste management strategy, the Entity collects and stores waste in accordance with legal requirements. Hazardous Wastes are transferred to licensed suppliers for disposal. Non-hazardous industrial wastes are recycled/re-used where possible.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods are disclosed in the annual Environment Performance Report: https://mp.weixin.qq.com/s?_biz=MzkyMjM3MDkwOA==&mid=2247483836&idx=2&sn=a6a6fff7771d9f3d1b99ab0ab743cd44&chksm=c1f4178ff6839e99a1f92ae3444dd8b2eb12978c5fd3bfa91e818041d0cd593883e01f904890&token=1409156807&lang=zh_CN#rd
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 (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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)	Conformance	The Entity has a dedicated hazardous waste storage are for Spent Pot Lining (SPL). The SPL are transferred to a licensed supplier for further treatment rather than being landfilled in the dedicated landfill approved by the local authority. The Entity has conducted testing of the underground water and nearby soil to monitor the SPL leakage controls. Relevant waste management training is provided to Workers.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	Before being transferred, the anode materials in SPL are pre-treated to extract the electrolytes to re-used in the electrolyzation process. Upon transfer to the licensed supplier, SPL is further treated to neutralize the harmful substance and the recyclable materials are recovered.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity transfers SPL to a licensed supplier for treatment and disposal. SPL is further treated to neutralize harmful substances and recyclable materials are recovered and non-recyclable components are landfilled. Disposal of waste is approved by and strictly monitored by the government agency.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	According to China's environmental regulations, SPL is strictly required to be disposed as Hazardous Waste and approved by the government agency. The Entity has implemented a process to collect information on any regulatory changes in SPL disposal methods and consider alternative options to landfilling.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	In accordance with China's environmental regulations, SPL is not permitted to discharge into marine or aquatic environments. No leakage into these environments is found at the Entity or the licensed disposal supplier.
6.8a Dross (recovery)	Conformance	In accordance with legal requirements on Hazardous Waste, the Entity transfers Dross generated at the casthouse to licensed suppliers for treatment to recover Aluminium and disposal.
6.8b Dross (recycling)	Conformance	In accordance with legal requirements on Hazardous Waste, the Entity transfers Dross generated at the casthouse to licensed suppliers for disposal. Besides the recovered Aluminium, other material extracted

CRITERION	RATING	COMMENT
		from dross is recycled for other purposes e.g., construction materials.
6.8c Dross (review of alternatives)	Conformance	The Entity annually evaluates the Dross licensed supplier to review the alternative options to landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use. The Entity only sources water from the municipal water supply and identifies the discharge and consumption source. The water balance analysis has been conducted.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment which considered the Entity's Area of Influence. Due to the nature of the product and production processes and that the Entity 100% recycles wastewater after treatment and does not discharge water to external environments, the level of water-related risk was identified as low.
7.2a Water management (management plans)	Conformance	There were no identified significant water-related risks in the Entity's Area of Influence. However, the Entity has established a process to collect statistic data of its major processes to establish a baseline. There is currently no detailed reduction target.
7.2b Water management (monitoring)	Conformance	There was no identified significant water related risks in the Entity's area of influence. Wastewater is monitored every quarter following treatment and 2021 and 2022 results indicate the water quality meets the GB18902-2020.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its Water Usage and Risk Assessment Report: https://mp.weixin.qq.com/s?_biz=MzkyMjM3MDkwO A==&mid=2247483723&idx=7&sn=2be7735ea05694af75e9126a3ccd450b&chksm=c1f41778f6839e6ec35e8a4d85675f58f726ae3e84db1eb09f6a99b723e6472d74b72038a546&token=1409156807&lang=zh_CN#rd: The water balance report is published at: https://mp.weixin.qq.com/s/ytCNvIQ0801GYPt8rbxqK Q
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity conducted a biodiversity risk assessment as part of the approved Environmental Impact Assessment Report:

CRITERION	RATING	COMMENT
		https://mp.weixin.qq.com/s/Q6xFMaOFihKOY2xE_dLdnw Based on the assessment and the underground water and soil monitoring reports, the biodiversity risk is assessed as low.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts.
8.3 Alien Species	Conformance	Based on the biodiversity risk assessment report, the Entity has very few opportunities to introduce Alien Species during its operation and supporting activities. The Entity provides relevant training course to employees to minimise the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Policy commitment to respect Human Rights and has communicated this to all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and a Due Diligence process is established covering Local Communities and the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channels to stakeholders. A

CRITERION	RATING	COMMENT
		remediation process for any adverse Human Rights impact have been established. No major impact has been reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected by the Entity. The Entity has implemented policies and processes to ensure respect for the rights and interests of women. No complaint from women Workers has been received.
9.3 Indigenous Peoples	Conformance	The Entity has established and implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. The local government is responsible for the land acquisition, employment replacement and communications with Indigenous Peoples involved in the development of the industrial zone where the Entity located. The Entity has paid all compensation fees in accordance with the regulations. Indigenous Peoples' representatives present that the Entity respects their right and interests, and living standards have improved.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity is responsible for assisting relevant government departments in communicating with Indigenous residents on the Entity's environmental protection measures, employment opportunities and other issues of concern to Indigenous Peoples. The Entity communicated with affected Indigenous Peoples during the project planning stage and the Indigenous People are satisfied with the results of the Entity's communication and support and have welcomed the establishment of local enterprises.
9.5 Cultural and sacred heritage	Conformance	The Entity has a established and implemented a procedure to identify cultural and religious sites and has conducted a risk assessment to reduce the impact on the sites.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has established a Policy and management procedure to consider feasible alternatives to avoid or minimise physical and/or economic displacement in project designs. The interests and concerns of Stakeholders were considered during the design and implementation phases of the project to minimise the impact of the Resettlement, while balancing environmental, social and financial costs and benefits.
9.6b Resettlements (where unavoidable)	Conformance	During the development of the industrial estate, the Entity actively participated in a tripartite consultation and communication mechanism with the government and Indigenous Peoples, and assisted the industrial

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		estate development authority and the affected Indigenous Peoples to reach a mutually satisfactory and legally compliant resettlement plan.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impacts on Local Communities are established and implemented. No complaint from the Local Communities has been received.
9.7b Local Communities (impacts)	Conformance	The Entity has identified and assessed the impact on the Local Communities. The control measures for the identified impacts on Local Communities are established and implemented. There has been no complaint from the Local Communities received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with Local Communities and a high proportion of employees are from these Communities. The Entity has joined the initiative proposed by the local government for donations to schools and kindergartens for the development of local education, refer to the Entity's Sustainability Report for further information: https://mp.weixin.qq.com/s/P9nXGsxQHkvL6nBV5ZpESA
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity commits to not using conflict minerals and communicates this through the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a commitment letter to not use conflict minerals. To date, no complaint on this issue has been received.
9.9 Security practice	Conformance	The Entity has established and implemented a Policy and procedure to commit to respecting Human Rights in security practices. All security guards are the Entity's contracted employees and are required to work in humane ways. No grievance or complaint against security activities has been received to date.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits to respect the Workers' rights. There are eighteen elected Worker representatives including two women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The management demonstrate the rights of Workers to Collective Bargaining is respected. There are no collective bargaining agreements in the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives meet regularly and act on behalf of Workers and address their concerns with management.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in China. The Entity has implemented a Policy prohibiting the use of Child Labour and there is no Child Labour or young Workers in the Entity.
10.2b Child Labour (hazardous)	Conformance	Young workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour including Human Trafficking. The Policy is communicated internally and to suppliers.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour. Workers are not required to provide any form of deposit, Recruitment Fees or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	There is no foreign Migrant Workers at the Entity.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans to Workers. Labour contracts signed between the facilities and Workers do not include terms related to Debt Bondage, and payslips indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a procedure that defines there is no restriction on Workers' movement at the Entity. This was verified through interviews with Workers.
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.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The signed labour contracts do not contain language to limit the Workers' ability to voluntarily terminate their employment. Workers know their right to terminate employment without penalty and the required notice time complies with labour contract law. The resigned Workers receive their wages without delay.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. No case of discrimination has been received. The

CRITERION	RATING	COMMENT
		recruitment advertisement and the training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The interviewed workers confirm they feel equal.
10.5 Communication and engagement	Conformance	Direct and frequent communication with Workers and the Workers' representatives is established. The communication channels are announced to Workers, and Workers can complain and raise concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures including management procedures, complies with legal requirements and requires the confirmation of the involved Worker. Disciplinary measures are defined and communicated to Workers.
10.7a Remuneration (living wage)	Conformance	The Entity has a wage structure that is clearly defined. The basic wage is above the legal minimum wage and total payments meets the Workers' basic needs. All Workers are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid to Workers by bank transfer at the end of the following month.
10.8 Working Time	Conformance	Working hours are recorded. Working hours are monitored and the monthly Overtime working hours do not exceed the legal monthly limit, and Workers are guaranteed at least one day per week.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Policy that is approved by the senior management, reviewed periodically and communicated with stakeholders. Refer to: https://mp.weixin.qq.com/s?_biz=MzkyMjM3MDkwOA==&mid=2247483858&idx=2&sn=01fb401be0a9b864bac6d9ac190360bb&chksm=c1f417e1f6839ef73f8f366e705560d7f60e0b83fd406a07c7671934886e5ff556c20e5b0b8d&token=2069259968&lang=zh_CN#rd
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to Workers and visitors. The control measures for OH&S hazards for Workers and visitors are established and implemented.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has implemented systems to identify all applicable legal and related requirements and evaluate legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training courses to understand the hazards, OH&S risks and actions determined as relevant for them and their right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented Occupational Health and Safety Management system according to ISO 45001:2018. As per site observation and management and worker interviews, no non-conformance was found.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in health and safety. Workers are encouraged to report their concerns or advice on OH&S issues, and management responds to the concerns and advice.
11.4 OH&S performance	Conformance	The Entity has established and documented Occupational Health and Safety targets in the OH&S Program. The implementation plans are established and implemented

Document Control and Version History

Revision	Date	Notes
0	30 January 2023	Initial Certification Audit – Full Certification