

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# SHANDONG NANSHAN ALUMINUM CO., LTD.

CERTIFICATE  
NUMBER

53

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

9 DECEMBER 2019

DATE OF EXPIRY

8 DECEMBER 2022

CERTIFIED SINCE

9 DECEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Ho', with a long horizontal line extending to the right.

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

CERTIFICATION SCOPE

Headquarter: Shandong Nanshan Aluminum Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the scope:  
Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities: (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I). (2). Shandong Nanshan Aluminum Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV). (3). Shandong Nanshan Aluminum Co., Ltd. (450,000 t/a aluminum alloy slab production line). (4). Plate Company of Shandong Nanshan Aluminum Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).  
Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities: (1). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line). (2). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME Shandong Nanshan Aluminium Co., Ltd.

ENTITY NAME Shandong Nanshan Aluminium Co., Ltd.

- **Certification Scope**

Headquarter: Shandong Nanshan Aluminum Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the scope:

Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

  - (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).
  - (2). Shandong Nanshan Aluminum Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).
  - (3). Shandong Nanshan Aluminum Co., Ltd. (450,000 t/a aluminum alloy slab production line).
  - (4). Plate Company of Shandong Nanshan Aluminum Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

  - (1). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line)
  - (2). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).

- SUPPLY CHAIN ACTIVITIES
- Alumina Refining
  - Aluminium Smelting
  - Aluminium Re-melting/Refining
  - Casthouses
  - Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit (23 – 28 September 2019)
- Surveillance Audit (27 – 31 December 2021)

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE	<ul style="list-style-type: none"> <li>● 23 – 28 September 2019 (Initial Certification Audit)</li> <li>● 27 – 31 December 2021 (Surveillance Audit)</li> </ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> <li>● 24 October 2019 (Initial Certification Audit)</li> <li>● 25 April 2022 (Surveillance Audit)</li> </ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 28 September 2019)</u></p> <p>Alumina Refining, Aluminium Smelting, Aluminium Re-melting/Refining, Casthouses, Semi-Fabrication processes managed by headquarters (China). Headquarter: Shandong Nanshan Aluminum Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the audit scope:</p> <p>Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"> <li>● (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).</li> <li>● (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).</li> <li>● (3). Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line).</li> <li>● (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).</li> </ul> <p>Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"> <li>● (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).</li> <li>● (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).</li> </ul> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> <li>● Alumina Refining</li> <li>● Aluminium Smelting</li> <li>● Aluminium Re-melting/Refining</li> <li>● Casthouses</li> <li>● Semi-Fabrication</li> </ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (27 – 31 December 2021)</u></p> <p>The audit scope included Headquarter functions at Headquarters: Shandong Nanshan Co., Ltd. (China) and the following sites/facilities:</p> <p>Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"> <li>● (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).</li> <li>● (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).</li> </ul>

- (3). Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line).
- (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

- (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).
- (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All applicable 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

9 December 2019 – 8 December 2022

NEXT AUDIT  
TYPE

Re-Certification Audit

NEXT AUDIT  
DUE DATE

8 December 2022

CERTIFICATE  
NUMBER

53

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Shandong Nanshan Aluminium Co., Ltd. has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Shandong Nanshan Aluminium Co., Ltd. has systems in place to maintain awareness of and to ensure compliance with Applicable Law. <a href="http://www.600219.com.cn/static/admin/upload/file/20190929/20190929000514_58732.pdf">http://www.600219.com.cn/static/admin/upload/file/20190929/20190929000514_58732.pdf</a>
1.2 Anti-Corruption	Conformance	Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent corruption are implemented and personnel are trained in these processes as verified through training records. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity also has a Policy for Labour and Business Ethics: <a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is available for all interested stakeholders on the official website of the Entity: <a href="http://www.600219.com.cn/static/admin/upload/file/20190929/20190929000514_58732.pdf">http://www.600219.com.cn/static/admin/upload/file/20190929/20190929000514_58732.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's management Policies are consistent with the relevant environmental, social, and governance practices. <a href="http://www.600219.com.cn/static/admin/upload/file/20220509/20220509144642_63519.pdf">http://www.600219.com.cn/static/admin/upload/file/20220509/20220509144642_63519.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, post on-site and on the website:

CRITERION	RATING	COMMENT
		<a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>
2.2 Leadership	Conformance	A senior Management Representative has been nominated.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an Environmental Management System in place and holds a valid ISO 14001: 2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems has been established and implemented. Social and occupational health and safety impacts are identified and assessed, the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. 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. The purchasing policies are part of the Entity's Policy for Labour and Business Ethics.</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a></p>
2.5 Impact Assessments	Conformance	The Entity will conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. There has been no such case since 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. The Emergency Response Plans on Social, OH&S and Environmental Accidents are well implemented and personnel are appropriately trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, however no such activity has happened since 2019.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment has been established in accordance to the requirement of the ASI Performance Standard, however, no such case has happened since 2019.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability Report is published on the Entity's website: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
3.2 Non-compliance and liabilities	Conformance	Shandong Nanshan Aluminium Co., Ltd. is a listed company on the stock market. The Entity publicly disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There were no significant fines or penalties imposed on the Entity as reported in 2020 Sustainability Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is published in the Entity's Annual Report, accessible on the Shanghai Stock Exchange website: <a href="http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2021-04-16/600219_20210416_4.pdf">http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2021-04-16/600219_20210416_4.pdf</a>
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 Whistleblowing/ Complaint/ Grievance Mechanisms exist (e.g. whistleblower hotlines, mail address, suggestion box). Please refer to the Entity's Policy for Labour and Business Ethics, page 5: <a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>
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 (PCA), available on the website : <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its aluminium product. The Environmental Life Cycle

CRITERION	RATING	COMMENT
		Assessment Report can be provided by external communication if required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment Report is published in the Entity's official website: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf</a>
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161050_81669.pdf</a>
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and, where generated target 100% of scrap for collection, recycling and/or re-use, refer to the Sustainability Report, Life Cycle Management of Solid Waste section, page 23: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity implement to separate Aluminium alloys and grades for recycling. The generated target for process scrap utilization rate is 100%, refer to the Sustainability Report, Life Cycle Management of Solid Waste section, page 23: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is communicating 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	Because there is not the complete local, regional or national collection and recycling systems for aluminium scraps in China, the Entity is working with the customer to decide how to improve the recycling rate of products at end-of-life.
<b>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</b>		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The major Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions and energy use by source are tracked, calculated and documented annually, refer the GHG Emissions Report 2020, sections 2 and 3, available directly or at the Entity's downloads webpage: <a href="http://www.600219.com.cn/static/admin/upload/file/">http://www.600219.com.cn/static/admin/upload/file/</a>



CRITERION	RATING	COMMENT
		<a href="http://www.600219.com.cn/nlist.html?category_id=228">20210609/20210609161151_21843.pdf</a> <a href="http://www.600219.com.cn/nlist.html?category_id=228">http://www.600219.com.cn/nlist.html?category_id=228</a> The GHG emissions are not checked by a third party. The GHG calculation methodology (raw data collection, transform and final statistics) for emission sources, particularly the indirect emission sources, is not defined clearly however and this has resulted in inaccurate reporting of several disclosed GHG data.
5.2 GHG emissions reductions	Conformance	The Entity has established a series GHG emission reduction targets towards 2021 which aim to reduce GHG emissions per product based on 2019 levels, aligning with the Group target assigned. The main strategy is to reduce electricity consumption and increase the scrap recycle rate. Refer to the GHG Emission Target report: <a href="http://www.600219.com.cn/static/admin/upload/file/20220215/20220215082424_31730.pdf">http://www.600219.com.cn/static/admin/upload/file/20220215/20220215082424_31730.pdf</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity operates its Environmental Management System in accordance with ISO 14001:2015 that has adequate evaluation procedures and operating controls to limit direct GHG emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has defined and implements a plan aimed at reducing Scope 1 and Scope 2 GHG emissions below 8 tonnes CO <sub>2</sub> -eq per metric tonne of aluminium by 2030. Refer to the GHG Emission Target report, available directly or at the Entity's downloads webpage: <a href="http://www.600219.com.cn/static/admin/upload/file/20220215/20220215082424_31730.pdf">http://www.600219.com.cn/static/admin/upload/file/20220215/20220215082424_31730.pdf</a> <a href="http://www.600219.com.cn/nlist.html?category_id=228">http://www.600219.com.cn/nlist.html?category_id=228</a>
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the Entity does not have plans for any new smelter lines to commence after 2020.
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. Emissions meets the local discharge limit. The Entity has implemented an air emission management plan with actions/controls to mitigate adverse impacts.
6.2 Discharges to Water	Conformance	Discharges to water is covered and managed within the environmental management system. The Entity has established water reduction targets and

CRITERION	RATING	COMMENT
		implemented a plan to minimize adverse impacts. The wastewater monitoring report 2021 indicates major pollutant meet local legal discharge limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of the areas of operations where spills and leakage may contaminate air, water and soil has been undertaken by following the risk assessment process of the environmental management system.
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 are handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of spills is defined in the Entity's management procedure on information disclosure. There have been no spills or leakage during 2020 or 2021.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessment and remedial action taken associated with spills will be published in the annual Sustainability Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a> There have been no spills during 2020 or 2021.
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 in compliance with the legal compliance.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposals information in the Sustainability Report 2021, refer page 18: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has bauxite residue storage facilities with adequate containment and protection. The new technology of the Dry Stacking Method to deposit bauxite residue has been implemented. Periodic monitoring and assessment for the Bauxite Residue Reservoir is implemented. For further information please refer to the Sustainability Report, page 18: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>

CRITERION	RATING	COMMENT
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The Entity implements operational and inspection procedures to regular check and monitor the Bauxite Residue Reservoir. An online monitoring system is used to monitor for displacement of the dam.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity has controlled and neutralised the water discharged from the Bauxite Residue Storage. There is no external discharge of water from the Bauxite Residue Storage. All waste water of the Bauxite Residue Storage is pumped back to the plant. Regular environmental monitoring of the Bauxite Residue Reservoir for wastewater pollution is undertaken. For further information refer to the Sustainability Report, page 18: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161024_31950.pdf</a>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity does not discharge water or bauxite residue from the Bauxite Residue Reservoir to marine and aquatic environments.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The dry-stacking technology for bauxite residue has been adopted by the Entity. The new technology to re-use bauxite residue is in testing by the Entity.
6.6f Bauxite Residue (remediation)	Conformance	The Entity has established a management plan for the Bauxite Residue Reservoir including how to mitigate the risk of future environmental contamination in the event of the closure of the Bauxite Residue Reservoir.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has a designated hazardous waste warehouse where the Spent Pot Lining (SPL) is stored in a manner that prevents the release of leachate (if generated) to the environment prior to shipment. SPL are packed into special bags and labelled as hazardous waste.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	According to China's environmental regulations, the Spent Pot Lining (SPL) is required to be disposed of as hazardous waste. The Entity optimizes the recovery and recycling of carbon and refractory materials, including optimizing the production process, minimising consumption of raw materials and efficiency gains.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	All the Spent Pot Lining (SPL) is required to be sent to a qualified supplier for disposal and is required to be disposed of as hazardous waste.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	According to China's environmental regulations, the Spent Pot Lining (SPL) is required to be disposed of as hazardous waste. SPL is sent to a qualified supplier to handle. The Entity has regularly evaluated the hazardous waste supplier based on their ability and qualification, including their investigation on the alternatives to landfilling of treated SPL and/or stockpiling of SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	Spent Pot Lining (SPL) is required to be sent to a qualified supplier for disposal. SPL is not discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Aluminium taken from the dross pressing is recycled in the Entity's melting furnaces. The remaining part is sold to external dross processors for further extraction of Aluminium, which can be used to produce Aluminium alloying ingots.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the dross pressing is recycled in the Entity's melting furnaces. The remaining part is sold to external dross processors for further extraction of Aluminium, which can be used to produce Aluminium alloying ingots.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable as there is no dross residue sent to landfill.
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 industrial park, nearby lands and waterways in the Entity's Area of Influence. Due to the nature of the product and production processes and with most of the Entity's sites having closed loop water management systems, the level of water-related risk was found to be low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	Water usage and water-related risks are published in the Water Risk Assessment Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161131_32920.pdf">http://www.600219.com.cn/static/admin/upload/file/20210609/20210609161131_32920.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity assessment as part of the Environmental Management System. The risk or impact on biodiversity by the Entity's operations and in the industrial park, nearby lands and waterways of their Area of Influence was assessed as low. The assessment involved qualified third parties and the report was approved by the local Environmental Protection Bureau (EPB). For further information please refer to the Biodiversity Risk Assessment Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20191008/20191008030256_38212.pdf">http://www.600219.com.cn/static/admin/upload/file/20191008/20191008030256_38212.pdf</a>
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	The main carrier medium (wooden pallets) 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		

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity's ASI Policy states the commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights. The due diligence process is established which includes the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and publishes the complaints/grievance channel to stakeholders. The remediation process associated with any adverse human rights impact is in place. There has been no major impact 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, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy is in place and is communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	Policies and processes to ensure respect for the rights and interests of Indigenous Peoples is established. However, this Criterion is not applicable as there are no Indigenous Peoples 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) is established. However, this Criterion is not applicable as there are no Indigenous Peoples involved.
9.5 Cultural and sacred heritage	Conformance	The Entity has a procedure in place to identify cultural and religious sites and conduct risk assessments to reduce impact on the sites. There is a Buddha Statue 10 km from the Nanshan Industry Zone and a Buddha Temple 7 km from the Donghai Industry Zone. The outcomes of the risk assessment and the feedback from the local religious affairs bureau, did not identify any impacts on the two sites. The Buddha Statue, Buddha Temple and the neighbouring resident communities are identified as within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on resettlement. However, this Criterion is not applicable as there has been no resettlement or displacement by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a procedure on resettlement. However, this Criterion is not applicable as there has been no resettlement or displacement by the Entity.
9.7a Local Communities (rights and interests)	Conformance	Based on the results of the Human Rights Due Diligence and a general risk assessment, which considered the rights and interest of local Communities, environment pollution was the only identified adverse impact on the local communities. Plans are implemented to mitigate adverse impacts. The Entity is active in community engagement at all their sites and at a corporate level. Through annual profits share, the Entity initiates projects that provide a positive impact to the communities.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. The control measures for the identified impact on local communities are established and implemented.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with local Communities and neighbourhood organizations to improve and support mutual interests. The Entity is active in community engagement at all their sites and at a corporate level. Through annual profits share, the Entity initiates projects that provides a positive impact to the communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not use conflict minerals, and communicates this through the Aluminium value chain. No conflict minerals are used by the Entity during production.
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect Human Rights in line with the ASI Performance Standard and good practices. The service agreement between the Entity and the security company and labour contracts of security workers also clearly defines the primary role of security workers which is to protect people, property and or assets and to respect Human Rights.



CRITERION	RATING	COMMENT
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. The Entity commits itself to respect the Workers' rights. There are 28 elected Worker representatives including nine women.
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 the right 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. Workers' representatives deal with the Workers' concerns with management on behalf of the Workers.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in China. There is no Child Labour or young Worker in the Entity.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. 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 commits itself - and expects its suppliers - to comply with the prohibition of Forced Labour, Slavery and Human Trafficking.
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 any form of deposit; recruitment fee or equipment in advance.
10.3c Forced Labour (migrant workers)	Conformance	There are 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. The Entity 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 sites.



CRITERION	RATING	COMMENT
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 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 Labor Contract Law: 30 days in advance or three days in the period of probation.
10.4 Non-Discrimination	Conformance	The Entity has policies and procedures in place that effectively ensure equal opportunities and it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	Regular meetings between Worker representatives and senior management, the grievance and complaints hotline and email, as well as operating procedures ensure open communication and direct engagement with Workers and their representatives 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, disciplinary measures are in compliance with legal requirements and require the confirmation of involved Worker. 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 wage structure is clearly defined, the basic wage meets the legal minimum wage. The total payment meets the Workers' basic need.
10.7b Remuneration (method of payment)	Conformance	All wage payments are documented and timely paid to all Workers by bank transfer between the 25th to 30th of the following month.
10.8 Working Time	Conformance	Working hours are recorded manually. Working hours are monitored and are in compliance with China Labor Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Occupational Health and Safety Policy is implemented, reviewed periodically and communicated with stakeholders.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Occupational Health and 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 Entity's Occupational 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 legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them and right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of Workers consultation and participation in health and safety. Workers are encouraged to report their concerns or advice on OH&S issues by themselves or by the Workers' representative and management responds to the concerns and advice raised.
11.4 OH&S performance	Conformance	Occupational Health and Safety (OH&S) targets and improvements are established and documented in the OH&S Program. The implementation plans are established and implemented.

#### **Document Control and Version History**

Revision	Date	Notes
0	9 December 2019	Issued (Full Certification)
1	16 July 2020	Hyperlinks updated for criteria 5.1 and 5.3
2	3 June 2022	Surveillance Audit