

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# NOVELIS ALUMINUM (ZHENJIANG) CO., LTD.

CERTIFICATE  
NUMBER

220

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

30 AUGUST 2022

DATE OF EXPIRY

29 AUGUST 2025

CERTIFIED SINCE

30 AUGUST 2022

AUTHORISED BY

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

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)

CERTIFICATION SCOPE

All activities on the Zhenjiang (China) site to produce  
aluminium products including:

- Cast Houses
- Scalper
- 160" Hot Rolling Mill
- Horizontal Heat-treatment furnace
- Stretcher up to 6,000T
- Plate sawing Center
- Ultrasonic testing
- Machining Center
- R&D Center & Testing Laboratory

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Novelis Inc
ENTITY NAME	Novelis Aluminum (Zhenjiang) CO., LTD.
CERTIFICATION SCOPE	All activities on the Zhenjiang (China) site to produce aluminium products including: <ul style="list-style-type: none"><li>• Cast Houses</li><li>• Scalper</li><li>• 160" Hot Rolling Mill</li><li>• Horizontal Heat-treatment furnace</li><li>• Stretcher up to 6,000T</li><li>• Plate sawing Center</li><li>• Ultrasonic testing</li><li>• Machining Center</li><li>• R&amp;D Center &amp; Testing Laboratory</li></ul>
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</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	4 – 6 July 2022
AUDIT REPORT SUBMISSION	20 July 2022
AUDIT SCOPE	<p>The audit scope includes all activities on the Zhenjiang site to produce aluminium products.</p> <p>The 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>

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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

30 August 2022 – 29 August 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

29 February 2024

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CERTIFICATE  
NUMBER

220

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The Entity has implemented systems to maintain awareness of and to ensure compliance with Applicable Law.
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 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 Whistleblower Policy: <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.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 implemented adequate measures, including training, communication to raise awareness of the code among business partners and suppliers. The Code of Conduct is available on the website: <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented management Policies that are consistent with the environmental, social, and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's Policies are available for internal and external stakeholders by training, on-site display and on the website: <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf</a>

CRITERION	RATING	COMMENT
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 System 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	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, accessible via the following link. <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/02_Novelis-Code-of-Conduct-October-2021-CHS.pdf</a>
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes to existing facilities. No such case has occurred in 2021.
2.6 Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 certificates and Jiangsu Province safety production standardization (Level 2). The Entity has 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 implemented and personnel are trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has occurred since 2020.

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 ASI Performance Standard, but no such activity has occurred since 2020.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is included as part of the Novelis Group sustainability reporting. The annual Sustainability Report is published on the Entity's website: <a href="https://zh-hans.novelis.com/wp-content/uploads/2021/04/Novelis-Sustainability-Platform-Brochure-Chinese.pdf">https://zh-hans.novelis.com/wp-content/uploads/2021/04/Novelis-Sustainability-Platform-Brochure-Chinese.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There have been no significant fines or penalties imposed on the Entity as reported in 2021 Sustainability Report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only make or have made on its behalf, payments to governments on a legal and/or contractual basis The Entity's financial audit reports are verified by an external Third Party accounting firm.
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., whistle-blower hotlines, suggestion box) and are accessible via the following link: <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	An environmental Life Cycle Assessment (LCA) report based on ISO 14040 and ISO 14044 has been prepared by a Third Party. The assessment includes all products and production lines and covers seven environmental impacts.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) report provides the cradle-to gate information on its aluminium products. The assessment report covers all product processes and production lines. The LCA report is available at:

CRITERION	RATING	COMMENT
		<a href="https://www.novelis.com/wp-content/uploads/2022/03/12.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf">https://www.novelis.com/wp-content/uploads/2022/03/12.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The LCA report is published on the Entity's website which can be reached by external stakeholders and the Entity provides the LCA report to external parties upon request:</p> <a href="https://www.novelis.com/wp-content/uploads/2022/03/12.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf">https://www.novelis.com/wp-content/uploads/2022/03/12.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf</a>
4.2 Product design	Conformance	<p>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 products.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has minimized the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection and recycling.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity separates the Aluminium alloys by grades for recycling. The target for process scrap utilization is 100%.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity is implementing a Recycling Alloy Development campaign, which aims to collect post customer scraps from automotive manufacturers. The campaign is currently at the feasibility analysis stage.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>In the absence of complete local, regional or national collection and recycling systems for aluminium scraps in China, the Entity is working with automotive manufacturers on opportunities to collect and recycle scrap at the End of Life.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The major sources of Scope 1 Greenhouse Gas (GHG) Emissions are from natural gas consumption, for Scope 2 are electricity and steam purchased. The energy consumption is monitored, documented and converted into GHG Emissions using the China National GHG protocol. The GHG Emissions report 2021 is checked and internally approved prior to publishing on the website: <a href="https://mp.weixin.qq.com/s/O56qV4r0du_lDbGTWwM97g">https://mp.weixin.qq.com/s/O56qV4r0du_lDbGTWwM97g</a>
5.2 GHG emissions reductions	Conformance	The Novelis Group established a global Carbon Footprint Strategy to 2050. Following the strategy, the Entity established local GHG Emission reduction targets and associated management programs. The information is available at: <a href="https://mp.weixin.qq.com/s/O56qV4r0du_lDbGTWwM97g">https://mp.weixin.qq.com/s/O56qV4r0du_lDbGTWwM97g</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 by the Entity is collected and treated before discharge and meets the local discharge limit. In compliance with the operational control requirements of ISO 14001, the air emission management plan with actions/controls is implemented to mitigate adverse impacts. Emissions to Air are monitored and monitoring reports indicate that emissions meet the legal emission limits.
6.2 Discharges to Water	Conformance	Discharges to Water is addressed and managed within the Environmental Management System which is compliance with ISO 14001:2015. The wastewater generated by the Entity is collected, treated and discharged into the Municipal Drainage System for further treatment. Wastewater is monitored and the major pollutants meet the local legal discharge limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	In compliance with ISO 14001:2015 requirements, an assessment of areas of operations where Spills



CRITERION	RATING	COMMENT
		and Leakage may contaminate air, water and soil is undertaken by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	In compliance with ISO 14001, and relevant legal requirements and based on the results of the Spills and Leakage risk assessment, the Entity has established the control measures in the daily operation procedures and the Emergency Response Plan for environmental accidents associated with Spills and Leakage. The relevant persons are provided with training.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of Spills and Leakage internally and externally is defined in the Emergency Response Plan and the incident hazard reporting and investigation procedure, as is known by the relevant persons. There has been no Spills or Leakage in the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Novelis Social Responsibility Manual has defined the requirement to disclose the amount, nature and potential impact of significant Spills to all relevant interested parties. In the annual public report, the impact assessment and the remedy measures are disclosed. The has been no Spills or Leakage in the past three years. Environmental performance in 2021 has been published: <a href="https://mp.weixin.qq.com/s/OIDa4L9GH8KKFof3-5_h7A">https://mp.weixin.qq.com/s/OIDa4L9GH8KKFof3-5_h7A</a>
6.5a Waste management and reporting (strategy)	Conformance	Waste management is addressed 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 has publicly disclosed the waste generation and disposal information for 2021 on its website: <a href="https://mp.weixin.qq.com/s/OIDa4L9GH8KKFof3-5_h7A">https://mp.weixin.qq.com/s/OIDa4L9GH8KKFof3-5_h7A</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.

CRITERION	RATING	COMMENT
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.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross is classified as a hazardous waste in China and is collected and transferred to suppliers licensed by the environment protection bureaus. The Entity collects 100% of the Dross and stores it temporarily prior to its transfer.
6.8b Dross (recycling)	Conformance	Dross is classified as a hazardous waste in China and is collected and transferred to suppliers licensed by the environment protection bureaus. The Entity collects 100% of the Dross and transfers it to suppliers for treatment, including recycling.
6.8c Dross (review of alternatives)	Not Applicable	Not applicable. Currently, the dross is classified as hazardous waste in China, shall be collected and transferred to suppliers which are licensed by the environment protection bureaus for disposal. It is the responsibility of the disposal suppliers to review alternative options to landfilling of Dross residues. Per the supplier survey, no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water is sourced from the municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into Municipal

CRITERION	RATING	COMMENT
		Drainage System is granted by the government agency for the sanitary wastewater. The water consumption and discharge amount are reported and analysed annually.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment via the approved Environmental Impact Assessment (EIA) report and pollutant discharge permit, in which the water discharge is identified and assessed. The Entity's operational, the internal and external water-related risks in its Area of Influence were considered And due to the nature of the product and production processes, and the external water environment, the level of water-related risk is low.
7.2a Water management (management plans)	Not Applicable	This Criterion in 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 in not applicable as 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 Entity has publicly disclosed the information on water-related risks in the Water-Related Risks Assessment Report and Water Balance Sheet: <a href="https://mp.weixin.qq.com/s/64J-5hmtUkXMKfiD9_FArw">https://mp.weixin.qq.com/s/64J-5hmtUkXMKfiD9_FArw</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is addressed in the Environmental Management System. The Entity has conducted an assessment on risks/impacts by its own operations and in its Area of Influence on biodiversity and the risk is assessed as low. The Biodiversity Risk Assessment Report is available at: <a href="https://mp.weixin.qq.com/s/lfr62mcJbk-t8UTC3LcyfQ">https://mp.weixin.qq.com/s/lfr62mcJbk-t8UTC3LcyfQ</a>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
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.

CRITERION	RATING	COMMENT
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 implemented a Policy 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 and a Due Diligence process is established includes the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to stakeholders. A remediation process for any adverse Human Rights impacts has been established. There has been no major Human Rights impacts reported.
9.2 Women’s Rights	Conformance	The Entity has implemented measures to ensure women's legal rights and interests are respected. The Equal Employment Opportunity Policy has been implemented and is communicated to all employees. There has been no complaint received from women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as policies and processes to ensure respect for the rights and interests of Indigenous Peoples are established. There are no Indigenous Peoples involved.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as policies and processes to ensure respect for the rights and interests of Indigenous Peoples are established. There are no Indigenous Peoples involved.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented a procedure to identify the cultural sites and religious sites, and has conducted a risk assessment to reduce the impact on cultural and religious sites.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on Resettlement. However, there has been no Resettlement or displacement conducted by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a procedure on Resettlement. However, there has been no Resettlement or displacement conducted by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impact on Local Communities are established and implemented. There have been no complaints received from the Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has implemented 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 employs Workers from the Local Communities, contributing to livelihoods through employment opportunities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has made a commitment to not using conflict minerals, and communicates this through the Aluminium value chain. There are no conflict minerals used by the Entity during production.
9.9 Security practice	Conformance	Security services are outsourced and the security contractor complies with the Entity's Supplier Code of Conduct. Body searches, including restriction of free movement, are not permitted. There has been no grievance or complaint against security activities received.
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. The Entity commits itself to respect the Workers' rights. There are nine elected union representatives including four 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 at the Entity, the Entity has a policy of respecting rights to Freedom of Association and Collective Bargaining.

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Union representatives are available to engage with management on behalf of the Workers on any issues of concern.
10.2a Child Labour (minimum age)	Conformance	Child Labour (under 16 years) is prohibited in China. There is no Child Labour or young Workers (16 to 18 years) at the Entity.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and 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. 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 company, 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 or hold Workers in debt bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour and 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 and does not retain Workers original documents, 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 employment is in compliance with Labour Contract Law.
10.4 Non-Discrimination	Conformance	The Entity has implemented policies and procedures that effectively ensure equal opportunities and the Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	Regular meetings between union representatives and senior management are conducted. The grievance and complaints hotline is announced. These mechanisms, as well as the Entity's 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 and disciplinary measures are not related to inhumane actions, harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation and, and require the confirmation of involved Worker. The Entity's discipline procedure has been implemented.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, and the basic wage is above the local legal minimum wage. The compensation for the Overtime meets the legal requirements. Mandatory allowances are provided to Workers. and all employees are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all Workers via bank transfer before the 28 <sup>th</sup> of the following month.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded. Working hours are monitored and are in compliance with China's Labour Law. However, 4% of Workers' Overtime during a quarterly period in 2022 exceeded the legal limit of 108 hours (up to 239 hours).
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Occupational Health and Safety Policy has been established, implemented, reviewed periodically, and communicated with stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational Health and Safety Policy is applied to Workers and Visitors in compliance with the legal requirements.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Minor Non-Conformance	The Occupational Health and Safety Policy includes a commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other

CRITERION	RATING	COMMENT
		requirements and evaluate the legal compliance quarterly. However, a revised regulation has not been identified and registered in the system.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	In compliance with the legal requirements, Workers are provided with training to understand the hazards, OH&S risks and the control measures that are aimed to protect them, and the right to refuse unsafe work without negative consequences.
11.2 OH&S Management System	Conformance	The Entity has established, implemented, maintained and continually improved the documented Occupational Health and Safety (OH&S) Management System. The Entity has a Work Safety Standardization Level Two certificate. The Entity holds all licenses, permits and test records as legally required. The operational controls on OH&S hazards are implemented and effective.
11.3 Employee engagement on health and safety	Conformance	The Entity has several mechanisms by which the Workers can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management. Workers are encouraged to report their concerns or advice on OH&S issues or via the Worker representative to management.
11.4 OH&S performance	Conformance	Occupational Health and Safety targets and improvements are established and documented in the Occupational Health and Safety Program. The implementation plans are established and implemented. The status of the targets is monitored periodically and reported to relevant management for further action as required.

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

Revision	Date	Notes
0	30 August 2022	Initial Certification Audit - Full Certification.