
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ZOUPING XINSANYUAN ALUMINIUM CO., LTD. & SHANDONG LONGKOU SANYUAN ALUMINIUM CO., LTD.

CERTIFICATE
NUMBER

276

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SGS-CSTC
STANDARDS
TECHNICAL
SERVICES

DATE OF ISSUE

8 MAY 2023

DATE OF EXPIRY

7 MAY 2026

CERTIFIED SINCE

8 MAY 2023

AUTHORISED BY

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

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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

Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Sanyuan Aluminium Co., Ltd.
ENTITY NAME	Zouping Xinsanyuan Aluminium Co., Ltd. & Shandong Longkou Sanyuan Aluminium Co., Ltd.
CERTIFICATION SCOPE	Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">21 – 24 November 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 April 2023
AUDIT SCOPE	<p>The audit scope includes Zouping Xinsanyuan Aluminium Co., Ltd. in Binzhou, Shandong Province, China and Shandong Longkou Sanyuan Aluminium Co., Ltd. in Yantai, Shandong Province, China.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- ☑ 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 8 May 2023 – 7 May 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 7 November 2024

CERTIFICATE NUMBER 276

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established the 'Compliance Management Procedure', which requires the annual identification and compliance evaluation of product quality, environment, occupational health and safety, food safety, Human Rights and social Applicable Laws and regulations. The 2021-2022 compliance evaluation report is recorded in the Entity's internal knowledge system platform.
1.2 Anti-Corruption	Minor Non-Conformance	In accordance with the Interim Provisions on the Prohibition of Commercial Bribery (State Administration for Industry and Commerce Order No.60), the Entity has established the Employee Anti-bribery and Anti-corruption Code. Employees sign the Anti-Bribery and Anti-Corruption Declaration annually. The Entity has an evaluation process for positions at high risk of Corruption and Bribery, including sales, procurement, human resources, external inspection and testing, and has formulated actions to address the risk. Gifts and entertainment are recorded. The Supplier Survey Report informs contact details for complaints. However, the Entity does not have clear instructions on Corruption regarding Extortion.
1.3 Code of Conduct	Conformance	The Entity has established the Environmental, Social, and Governance (ESG) Code of Conduct, which is signed and issued by the General Manager and addresses ethics, labour and Human Rights, occupational health and safety, environment, Management Systems, prohibition of conflict minerals and anti-Corruption. The Entity communicates the ESG Code of Conduct with employees through the labour contract, employee manual and other channels. Employees have been given training on the Code.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Environmental, Social and Governance (ESG) Policies including the Quality and Food Safety Policy; Environmental and Energy Management Policy; Occupational Health and Safety Policy; Labour Rights and Business Ethics Policy; and Responsible Procurement Policy, available at: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629881469915136

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Policies are endorsed by the General Manager who has signed the Management System Manual. Policies are reviewed for adequacy and suitability during the annual Management System review.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has published its ESG Policies on the website: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629881469915136 In the quarterly four-party meeting, the Entity communicates the implications of the Policies with key customers and major suppliers. Overseas customers are communicated with on relevant policies. The ESG Policy is communicated through controlled documents, and the General Management Policy is displayed on bulletin boards. The Entity communicates the Policies internally as confirmed during interviews.
2.2 Leadership	Conformance	The Entity has nominated the Vice General Manager as the Management Representative. The Vice General Manager has responsibility for EHS, social responsibility and the ASI Management System on behalf of the General Manager. A clear description of the responsibilities associated with the role is outlined.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an integrated Management System. The Sandong Longkou Sanyuan Aluminium Co., Ltd. site has obtained ISO 9001, ISO 14001 and ISO 45001 certifications for its Management Systems.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established a Social Management System in accordance with SA8000 standards, issued a Management Manual and guidelines, observes the ILO Convention (29, 105, 87, 98, 100, 111, 135, 138, 146, 155, 164 and 177) and the Global Declaration of Human Rights and Convention on the Rights of the Child; and established the Management Procedure of Employee Rights and the Communication Management Procedure.
2.4 Responsible Sourcing	Conformance	The Entity has implemented the 'Procurement Management Procedure', which requires Due Diligence on Suppliers' activities regarding Labour Rights, Anti-Corruption and Anti-Bribery, Human Rights, environment, and occupational health and safety. Suppliers sign a Responsible Procurement Statement and raw material procurement contract. The Entity requires Suppliers and Contractors to complete self-evaluation questionnaires regarding the

CRITERION	RATING	COMMENT
		supplier quality system, environmental protection and occupational health and safety management. The Entity evaluates the questionnaires and has a grading system to determine suitability as a qualified supplier.
2.5 Impact Assessments	Conformance	<p>The Entity has established an 'Impact Assessment Management Procedure' that requires Impact Assessments to address environmental, social, cultural and Human Rights aspects for New Projects or Major Changes.</p> <p>The Entity has undertaken Impact Assessments for a production line expansion (in 2019) and a new Aluminium packaging material production line (commenced 2017), available at: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296 and http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344</p> <p>Both Impact Assessment reports evaluated only environmental, social and cultural impacts and not Human Rights. However, following the establishment of the ASI Code of Conduct, the Entity has since conducted Due Diligence on social responsibility which addressed Human Rights and the evaluation results are available in the Social Responsibility Report: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629783036125184</p>
2.6 Emergency Response Plan	Minor Non-Conformance	<p>The Entity's sites have established contingency plans for various emergency scenarios, and these are filed with the relevant local environmental protection bureaus. Drills are conducted and evaluated to improve the plans.</p> <p>However, the necessary contact information or mechanism for communication with the affected parties is not included in all contingency plans.</p>
2.7 Mergers and Acquisitions	Conformance	The Entity has established the 'Company Merger, Acquisition, Capital Increase, Capital Reduction, Closure, Dissolution and Liquidation Regulations' procedure. To date, no mergers or acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established the 'Company Merger, Acquisition, Capital Increase, Capital Reduction, Closure, Dissolution and Liquidation Regulations' procedure. To date, no closure, decommissioning or divestment has occurred.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has established the 'Communication Management Procedure', which stipulates the inclusions for internal and external communications, including the sustainability assessment content. The Social Responsibility Report is available on the website: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629783036125184
3.2 Non-compliance and liabilities	Minor Non-Conformance	The Entity has established the 'Company Information Disclosure Management System', which stipulates the disclosure requirements for mandatory regulatory disclosures, such as violations, responsibilities, payments to the government, leakage and waste treatment. Since the implementation of the ASI Code of Conduct, there have been no major incidents involving fines, judgments, penalties and non-economic sanctions. However, the Entity has not disclosed information on government payments or punishments.
3.3a Payments to governments (legal and contractual)	Conformance	In accordance with the Interim Provisions on the Prohibition of Commercial Bribery (State Administration for Industry and Commerce Order No.60), the Entity has established the 'Code of Anti-bribery and Anti-corruption Conduct for Employees' to control Bribery and other Corruption behaviours. The Entity undertakes an independent audit of all payments. Currently, the payments to government are for taxes, there are no other non-tax payments.
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 the 'Company Information Disclosure Management System', which stipulates the Complaints Resolution Mechanism and process. To date, the Entity has not received any complaints from employees, suppliers and other interested parties. Community complaints have been received through the local environmental protection bureau regarding odour emissions. The Entity has actively cooperated with the Ecology and Environmental Bureau to sample and monitor the emissions which determined the Entity was not responsible. Training records and training evaluation forms to implement the 'Communication Management Procedure' are maintained.
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has developed environmental Life Cycle Assessments (LCA) for its major production lines, which refer to the ISO 14044:2006 methodology.</p> <p>The Longkou site has published an LCA report: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700748366118912</p> <p>The Zouping site has published an LCA report: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620630063056846848</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	<p>The Entity is required by some customers to provide LCA information on its Aluminium products, which it provides. Customers can also access the LCA reports from the website.</p> <p>However, neither LCA report includes information on the environmental impact of SO₂ and NO_x from natural gas combustion.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has developed LCAs that refer to the ISO 14044:2006 methodology and includes the system boundaries from Bauxite Mining to the door of the customer plant. The LCA reports are available at: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700748366118912 and http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620630063056846848</p>
4.2 Product design	Conformance	<p>The Entity has established and implemented the 'Research and Development Procedure' and has established key performance indicators for the designing process. Following the product development process, the environmental impacts are taken into consideration. The targets for the Zouping and Longkou sites were verified.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has established the 'Waste Aluminium Management Regulation', which stipulates outbound waste Aluminium, warehousing and storage operation standards. The Entity has an Aluminium Process Scrap recycling plan with a 100% recycling target for Aluminium Process Scrap.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has established processes to separate Aluminium alloys and grades into raw material classes for recycling (including 3-series (3104\3105), 5-series (5182\5052), and 8-8011). The classes include white and colour categories.</p>

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a plan to recycle waste Aluminium from upstream suppliers to manufacture new Aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity cooperates closely with a local scrap Aluminium product recycling company (Shandong Mingfeng Trading Co., Ltd). The Entity transfers 100% of the process waste and scrap products to the recycling company to improve the recycling rate of its Aluminium-containing products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has implemented a 'GHG Controlling and Management Procedure', which requires annual analysis of data and Greenhouse Gases (GHG) emissions reporting as per ISO14064-1:2018. The Entity has separately accounted for and publicly disclosed annual Material GHG emissions and energy use by source for its two sites:</p> <p>Lonkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700276750188544</p> <p>Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615249354407100416</p> <p>The reports include the methodology for determining Direct and Indirect (Scope 1, 2 and 3) GHG emissions.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has reported its GHG emissions reduction strategies in the GHG Inventory Report, Chapter 7.1:</p> <p>Lonkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700276750188544</p> <p>Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615249354407100416</p> <p>The GHG Emissions Reduction Plan for 2023 includes targets that cover the material sources of Direct and Indirect GHG emissions:</p> <p>http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629544902184960</p>
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.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has quantified and reported Emissions to Air that have adverse effects on humans or the environment in the site-specific Environmental Impact Assessment (EIA) Report: Longkou EIA Report, pages 128-147: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296 Zouping EIA Report, pages 68-79: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344</p> <p>The Entity has established an air emissions management plan, which addresses the installation of waste gas treatment and a monitoring plan. The monitoring plan is in accordance with the Pollutant Discharge Permit, available on the local government website: http://permit.mee.gov.cn/cas/login?service=http%3A%2F%2Fpermit.mee.gov.cn%2FpermitExt%2Foutside%2FLicenseRedirect</p> <p>The Entity has disclosed annual air emissions monitoring reports for its sites on the website: Longkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700963521331200 Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1640261051005628416</p>
6.2 Discharges to Water	Conformance	<p>The Entity has quantified and reported Discharges to Water that have adverse effects on humans or the environment in the site-specific Environmental Impact Assessment (EIA) Report: Longkou EIA Report, pages 157-179: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296 Zouping EIA Report, pages 80-102: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344</p> <p>The Entity has established a wastewater management plan, which addresses the operation of a wastewater treatment station and a monitoring plan. The monitoring plan is in accordance with the Pollutant Discharge Permit, available on the local government website:</p>

CRITERION	RATING	COMMENT
		<p>http://permit.mee.gov.cn/cas/login?service=http%3A%2F%2Fpermit.mee.gov.cn%2FpermitExt%2Foutside%2FLicenseRedirect</p> <p>The Entity has disclosed annual wastewater discharge monitoring reports for its sites on the website:</p> <p>Longkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700963521331200</p> <p>Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1640261051005628416</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has established an Emergency Plan for Environmental Emergencies at the Longkou and Zouping sites, based on the evaluation of the risk where Spills and Leakages may contaminate air, water and soil. The Entity has identified the risk of potential Spills and Leakages from untreated wastewater, VOCs from the painting process and natural gas. Details are available in the EIA Report:</p> <p>Longkou EIA Report, page 214: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296</p> <p>Zouping EIA Report, page 118: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has installed combustible gas (e.g., CH₄, xylene) detection alarms at its production site, along the gas pipe and painting warehouse. Calibration certificates of the detection alarm are retained. Neighbours have been informed about the emergency plan and the neighbouring company attended the emergency plan review meeting.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has established the 'Emergency Preparing and Response Management Procedure', to address the reporting requirement for emergencies and the 'Information Disclosure Management Regulation' stipulates the disclosure of Spill and Leakages events. The Emergency Plan for Environmental Emergencies addresses the potential impact of Spills. To date, no significant Spills or Leakages have occurred.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has established the 'Emergency Preparing and Response Management Procedure', to address the reporting requirement for emergencies and the 'Information Disclosure Management Regulation' stipulates the disclosure of Spill and Leakages events.</p>

CRITERION	RATING	COMMENT
		The Emergency Plan for Environmental Emergencies addresses the potential impact of Spills. To date, no significant Spills or Leakages have occurred.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established the 'Solid Waste Management Procedure', which stipulates collection, transportation and disposal measures. Hazardous Waste is transferred to and disposed of by local government qualified companies. Other industrial solid waste, such as plastic and wood is sold to recycling companies.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a procedure for Hazardous Waste and Non-Hazardous Waste. An annual summary of Non-Hazardous Waste disposal is available in the Management Review Report, page 5: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620700460506243072 The quantity of disposed Hazardous Waste in 2021 is disclosed on the website at: http://www.sy-aluminium.com/news/23.html
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.
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.

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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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Minor Non-Conformance	The Entity has established a procedure to map the Entity's water consumption and withdrawal by quantity and source. However, the procedure has no documented methodology for determining the Entity's water balance. The calibration records for instrumentation used to account for water consumption are not available.
7.1b Water assessment (risk assessment)	Conformance	Both the production and domestic wastewater are treated by the Entity's wastewater treatment station before discharge to the local Yongwen River Wastewater Treatment Plant. The Entity has assessed the impact of its water use and concluded that the risk is low as the Entity's industrial water consumption is low and they do not use groundwater or directly extract surface water. For further information, refer to the EIA Reports: Longkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296 Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as the Entity has assessed the water-related risks and determined the risk is low.
7.2b Water management (monitoring)	Minor Non-Conformance	Whilst the water-related risks have been assessed as low, the Entity has established a procedure that stipulates the regular monitoring of water consumption and performance of the water reduction target. However, there is no evidence that the instruments used to monitor water are calibrated.
7.3 Disclosure of water usage and risks	Conformance	The Entity has assessed its water usage and water-related risks including potential impact on local

CRITERION	RATING	COMMENT
		<p>protected water resource areas. This information is available in the Longkou factory EIA Report, page 123: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296 and the Entity's Management Report, page 5: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629978685493248</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity's sites are located within industrial zones developed by the local governments. The Entity has used qualified third parties to undertake Environmental Impact Assessments (EIA) as part of the site planning and for subsequent expansion projects at the Langkou and Zouping sites. The risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence is included in the EIA, which determined there is no protected flora or significant fauna in the area and the sites are not within ecological preservation areas. Based on the EIA, the Entity has established plans to monitor the Emissions to Air and Discharges to Water.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has assessed the risks and materiality of impacts on Biodiversity through various EIA reports developed during planning and expansion projects. The main risk to Biodiversity is the impact on biological habitats caused by air pollution and water pollution. The Entity has established the 'Biodiversity Protection Management Regulation', which requires a Biodiversity Action Plan and annual reporting. The monitoring reports of air emissions and discharge of wastewater confirm that control measures are executed and effective.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has established the 'Biodiversity Protection Management Regulation', which requires a Biodiversity Action Plan and annual reporting. Based on the EIA, which determined the impacts on Biodiversity, the Entity has established plans to monitor the Emissions to Air and Discharges to Water.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has established the 'Biodiversity Protection Management Regulation', which requires the disclosure of an annual Biodiversity Assessment Report: Longkou: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620698827853037568</p>

CRITERION	RATING	COMMENT
		Zouping: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629664807682048
8.3 Alien Species	Conformance	The Entity has identified the risk of the introduction of Alien Species as low. Staff are trained on 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 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 commitment within its corporate policies to respect Human Rights. Training on the policies is carried out, posted on-site and made available on the Entity’s website: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629881469915136
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Due Diligence process covers the supply chain. The Entity has a Human Rights Due Diligence Report. The Entity has a ‘whistleblower’ hotline (Longkou on 0535-3127855 and Zouping on 0543-4850708) and email (sdlksylc@163.com) listed on the website: http://www.sy-aluminium.com/contact.html To date, there are no known Human Rights violations at the Entity.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established the ‘Human Rights Due Diligence Procedure’ and ‘Communication and Participation Management Procedure’, which together ensure remediation through legitimate processes where actual Human Rights impacts are identified. The Entity establishes and publishes a complaints/grievance channel to Stakeholders. To date,

CRITERION	RATING	COMMENT
		the Entity has not caused or contributed to adverse Human Rights impacts, as such, no remedy is needed.
9.2 Women's Rights	Conformance	The Entity has established a 'Women's Rights Management Procedure' that protects women's rights. The Entity has established a female worker committee. Interviews with Workers confirmed women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.
9.3 Indigenous Peoples	Conformance	Whilst there are no Indigenous Peoples within the industrial zones of the Longkou and Zouping sites, the Entity has established and implemented the 'Indigenous Peoples Management Procedure'.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	Whilst there are no Indigenous Peoples within the industrial zones of the Longkou and Zouping sites, the Entity has established the 'Indigenous Peoples Protection and Free, Prior, and Informed Consent Procedure'. This procedure defines that the Entity will consult and cooperate in good faith with Indigenous Peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, where New Projects or Major Changes to existing projects may have significant impacts on the Indigenous Peoples associated culturally with and living on the relevant lands.
9.5 Cultural and sacred heritage	Conformance	Whilst the Entity is located within industrial park locations and there are no cultural or sacred heritage sites or values, the Entity has defined a 'Local Community Management Procedure' to protect cultural and sacred heritage.
9.6a Resettlements (avoid or minimise)	Conformance	Whilst the Entity is located within industrial park locations and no resettlement was required, the Entity has established a 'Resettlements Management Procedure'.
9.6b Resettlements (where unavoidable)	Conformance	Whilst the Entity is located within industrial park locations and no resettlement was required, the Entity has established a 'Resettlements Management Procedure'.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established a 'Local Communities Management Procedure' that requires the Entity to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and

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		their use of natural resources. The Entity is located within industrial park locations planned by local governments. To date, no complaints from Local Communities have been received.
9.7b Local Communities (impacts)	Conformance	The Entity has established a 'Local Communities Management Procedure' that requires the Entity to take appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities when necessary.
9.7c Local Communities (livelihoods)	Conformance	The Entity is committed to exploring with the Local Communities opportunities to respect and support their livelihoods. The Entity employs people from the Local Communities, and the majority of employees are from the Local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment in the Responsible Sourcing Policy to not use conflict minerals and communicates this through the Aluminium value chain.
9.9 Security practice	Conformance	The Entity has established a 'Security Practice Management Procedure', which requires the Entity and security providers to respect Human Rights. Security guards had been trained on respecting Human Rights.
10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Freedom of Association. All employees at the Longkou and Zouping sites are a member of the relevant Labour Union. The Longkou Labour Union has 31 employee representatives, and the Zouping Labour Union has 30 employee representatives.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Collective Bargaining. To date, there has been no violation under the 2022 Special Collective Bargaining Contract.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Freedom of Association and the right to Collective Bargaining within Applicable Law. Worker interviews confirmed that Workers' representatives can deal with the Workers' concerns with management. The Entity maintains records of Labour Union meetings.

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10.2a Child Labour (minimum age)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour. Staff in the Human Resources Department know the requirements. The Entity does not use Child Labour, and the youngest employee is 20 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour and prohibition of young Workers (under 18 years) involved in dangerous or harmful work or Overtime. The Entity does not use Child Labour, and the youngest employee is 20 years old.
10.2c Child Labour (worst forms)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour and prohibition of young Workers (under 18 years) involved in dangerous or harmful work or Overtime. The Entity does not use Child Labour, and the youngest employee is 20 years old.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. All Workers have signed a labour contract which is filed with the local government. The Entity does not engage in nor support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. All employees are hired directly. The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. No Worker is required to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity doesn't

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		hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity does not retain Workers' original documents, only copies are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. Workers can terminate their employment with a specific notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the labour contract law: 30 days in advance or three days in the period of probation.
10.4 Non-Discrimination	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the Entity shall ensure equal opportunities and not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, in line with ILO Conventions C100 and C111. Worker interviews confirmed there is no Discrimination. To date, no case of Discrimination has been received.
10.5 Communication and engagement	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Freedom of Association. Worker interviews confirmed that Workers' representatives can deal with the Workers' concerns with management.
10.6 Disciplinary practices	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the Entity shall neither engage in nor tolerate the use of corporal punishment, mental or physical coercion,

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		harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity's disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved.
10.7a Remuneration (living wage)	Minor Non-Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the total Remuneration payments should meet the Workers' basic needs. All Workers are enrolled in the mandatory social insurance scheme. The lowest Worker wages are above the minimum wage. A high-temperature allowance is paid according to position/role. However, during the salary audit, it was found that the Workers' Overtime salary did not meet the local minimum wage standard.
10.7b Remuneration (method of payment)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the requirement for wage payments to be timely, in legal tender and fully documented. Wages are paid on the 28 th of every month, as confirmed during Worker interviews and review of the signed remuneration sheet.
10.8 Working Time	Minor Non-Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the Working Time. Employee records are maintained by the Entity to record monthly working hours, including working days, Overtime working hours, public holidays and paid annual leave. Employee monthly Overtime did not exceed Chinese labour laws (less than 36 hours monthly). However, it was found that some Workers had worked more than three hours Overtime in a day, which does not meet legal requirements.
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) Management System, certified to ISO 45001:2018. The documented OH&S Policy is available in the Entity's compilation of Production and Operation Policies: http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629881469915136
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an OH&S Policy that applies to Workers and Visitors. Worker interviews found that Workers are aware of the Entity's OH&S Policy.

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11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an OH&S Policy that includes the commitment to comply with Applicable Law on Worker's health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non-Conformance	The Entity has implemented an OH&S Policy. However, the Policy does not specify that employees have the right to understand the hazards and safety measures of their work and the right to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System, certified to ISO 45001:2018. Details of the certificate are available at the National Certification and Accreditation Information Public Service Platform (via certificate number CN22/00004593).
11.3 Employee engagement on health and safety	Conformance	The Entity has provided Workers with a mechanism to raise, discuss and participate in the resolution of OH&S issues with management, including via email, hotline and the Labour Union.
11.4 OH&S performance	Conformance	The Entity has established the indicators to monitor and evaluate its OH&S performance, such as the occupational hazard factors detection report and occupational disease physical examination report.

Document Control and Version History

Revision	Date	Notes
0	8 May 2023	Initial Certification Audit – Full Certification