
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**YUNNAN HAOXIN
ALUMINUM FOIL
CO., LTD**

CERTIFICATE
NUMBER

133

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV RHEINLAND
CERT GmbH

DATE OF ISSUE

7 JULY 2021

DATE OF EXPIRY

6 JULY 2024

CERTIFIED SINCE

7 JULY 2021

AUTHORISED BY

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

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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

Aluminium re-melting, refining and semi-fabrication
activities associated with the manufacture of
aluminium foil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Yunnan Haoxin Aluminum Foil Co., Ltd
ENTITY NAME	Yunnan Haoxin Aluminum Foil Co., Ltd
CERTIFICATION SCOPE	Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of aluminium foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (23 – 25 March 2021)Surveillance Audit (13 – 15 February 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">23 – 25 March 2021 (Initial Certification Audit)13 – 15 February 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 April 2021 (Initial Certification Audit)23 April 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 25 March 2021)</u></p> <p>The audit scope included the aluminium re-melting, refining and semi-fabrication associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (13 – 15 February 2023)

The audit scope included the production of the aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of aluminium foil and plate at the whole Entity excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.

Supply chain activities included in the Audit Scope:

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

All relevant 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

7 July 2021 – 6 July 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

6 July 2024

CERTIFICATE
NUMBER

133

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established procedures to collect applicable legal law/regulation. The legal, environment, health and safety (EHS) and human resources departments are charged with the collection and assessment (at least once per year) of Applicable Law covering labour, ethics, health and safety and environment sections.</p> <p>One qualified law officer and one full-time qualified lawyer are hired to assist in the update and assessment of Applicable Law.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established business ethics policies and procedures including anti-Extortion and Bribery, and training is provided to employees. The ethics reporting channel is posted in the meeting room and canteens. A Due Diligence investigation on high-risk positions in the Entity, such as the purchasing department, sales, quality, and warehouse, requires all staff in these departments to sign an Honesty Commitment Letter. An internal audit on ethics is conducted at least once per half a year.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established an ASI Policy and related procedures consistent with the ASI Performance Standard and provides training to Workers periodically. The Entity has communicated the Code of Conduct to their Suppliers and requires them to sign an ASI Performance Standard Commitment Letter. The Entity's ASI Policy is included in the Sustainable Development Report 2021, pages 6 and 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established a Management System including an ASI Policy on environmental, social and governance compliance. The Entity's ASI Policy is included in the Sustainable Development Report 2021, pages 6 and 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has implemented the ASI Management System which was established by the senior management team of the Entity. The effectiveness of the system is reviewed during annual management reviews.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The ASI Policies are made available for internal and external Stakeholders through training, posts on site, the website and in the Sustainable Development Report of 2021, pages 6 and 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p>
2.2 Leadership	Conformance	<p>The Vice General Manager has been appointed as the Management Representative for ensuring the ASI social, environmental and governance requirements are reflected by the Entity. The authorities and responsibilities of the role are defined in the appointment letter. An ASI Team is also established to support the ASI Management System implementation.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>An Environmental Management System has been established and implemented. The Management System is certified against ISO 14001 by an accredited certification body.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established a Management System, which covers a social Management System. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity is committed to responsible sourcing. Responsible sourcing activities are implemented by the Entity through signed ASI Commitment Letters, supplier assessments and emphasis on suppliers to implement ASI Performance Standard requirements. The responsible sourcing policy is available in the annual Sustainable Development Report 2021, page 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p> <p>The Entity has re-classified their suppliers according to the risk assessment, which includes risk factors such as the volume of trade, risk level of location, negative history and high-risk processes. High-risk suppliers sign an ASI commitment letter and are audited regularly, and low-risk suppliers sign a commitment letter and respond to the Self-Assessment Questionnaire (SAQ). In 2022, the Entity audited the 12 identified high-risk suppliers. However, the Entity has not issued SAQ's for the low-risk suppliers for completion. According to the internal plan, the SAQ would have commenced in November 2022, but due to the impact of COVID-19, it has been postponed to March 2023.</p>

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	The Entity has conducted a Social Accountability Risk Assessment that addresses the environmental, social, cultural and Human Rights impacts for all New Projects and Major Changes to existing Facilities. No Material risk is identified.
2.6 Emergency Response Plan	Conformance	The Entity has developed specific emergency response plans in collaboration with potentially affected Stakeholder groups such as Local Communities, Workers, Fire Bureau and Environment Bureau. The Entity has conducted emergency drills according to the frequency defined in the plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger or acquisition control procedure, including a Due Diligence process before a merger or acquisition. In the past three years, there has been no merger or acquisition in the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closure, decommissioning and divestment control procedure in accordance with the requirement of the ASI Performance Standard. No such event has occurred since the ASI Management System commenced, or in the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has disclosed the governance approach and material environmental, social and economic impacts below reports:</p> <p>2021 Sustainability Development Report: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p> <p>LCA Report: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173951346.pdf</p> <p>GHG Report: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173957223.pdf</p> <p>Environment Improvement Plan: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173993597.pdf</p> <p>Biodiversity Assessment Report: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217545055734775.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity provides information on non-compliance and liabilities. Non-compliance issues are publicised in the Sustainable Development Report 2021, page 18: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p>

CRITERION	RATING	COMMENT
		No fine or punishment was received during 2021 to 2023.
3.3a Payments to governments (legal and contractual)	Conformance	The Financial Audit Report 2021, issued by a qualified third party, identified that the Entity's payments to government are only those legally required and there are no other payments. The Entity has disclosed the payments to governments in the Sustainable Development Report 2021, page 18: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
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 developed and implemented policies, systems, procedures, and processes that conform to the Stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from Stakeholders and has a resolution mechanism. The communication channels (telephone, email) are made public to internal and external Stakeholders and are included in the Sustainable Development Report 2021, page 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and implemented policies and processes for Life Cycle Assessment (LCA). At the time of the audit, the Entity had an LCA report for the two products of Aluminium plate and foil respectively.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented policies and processes for LCA. The policies state it could provide the LCA upon customers' request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented policies and processes for LCA, including public communication. The latest LCA report is published on the website: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173951346.pdf
4.2 Product design	Conformance	The Entity has established procedures for LCA in the product design process, the LCA shall consider various environmental impacts including energy and water consumption, wastewater, air emission and solid waste. In the design phase, all the

CRITERION	RATING	COMMENT
		environmental factors of LCA have been identified and listed in the final design reports with quantification data for each factor and continual improvement objectives.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and improvement programs for each process to reduce scraps during production. 100% of scraps are recycled by the internal smelter workshop. The scraps generated rate is reviewed at the monthly management meeting to ensure targets are on track.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a scrap and Dross classification and management procedure to classify and dispose of the different kinds of Aluminium scraps. All the scraps are classified in alloy separation and disposed of by different smelters. Related records are kept for review.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The ASI System Manual defines a strategy for the collection and recycling of Aluminium products at End of Life. The collection and recycling data are kept by the material accounting system. The strategy includes clear targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no complete local, regional or national collection and recycling systems for Aluminium Scrap in China. The ASI System Manual defines that the Facility shall try to improve the reuse rate of Aluminium. At present, the Facility has signed recycling contracts with customers to collect the scraps of products at End of Life and related recycling records are kept. The Entity monitors the recycling rate in the products monthly and there is a detailed program to improve the reuse rate of Aluminium for products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published Greenhouse Gases (GHG) emissions data on the website: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173957223.pdf The GHG calculation covers all the potential sources.
5.2 GHG emissions reductions	Conformance	The Entity has established targets to reduce CO ₂ emissions by 0.5% for 2022 (against 2021 data) and by 0.5% for 2023 (against 2022) and has established and implemented improvement programs covering direct and indirect emission sources to achieve the target. Management review records confirm the 2021 target has been achieved, and the 2022 target was still under review at the time of the audit. The

CRITERION	RATING	COMMENT
		<p>management team reviews progress against the target annually. Energy data is tracked and reviewed monthly.</p> <p>The major GHG generation sources are electricity and natural gas, and the source of electricity is 7% coal-fired and 93% hydro-powered. The Entity's GHG emissions reduction plan is available at: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173957223.pdf</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.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	<p>The Entity has established an air emissions inventory for all air emission sources and a qualified third party monitors all the outlets according to the monitoring plan in the Entity's Pollution Discharge Permit (PDP). The Entity is not a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for air emissions discharges. The Entity has established reduction targets for major indexes such as sulphur dioxide and non-methane hydrocarbon annually and the targets are tracked and reviewed by the management team annually. To achieve the targets, the Entity has implemented improvement programs to reduce air emissions. The Entity has published air emissions data in the Sustainable Development Report of 2021, pages 9 and 10: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p> <p>The Entity has established emergency response programs (ERP) for the waste air treatment system and all the abnormalities of the system are clearly recorded and treated according to the ERP requirements. A treatment system for the acidic exhaust air from the laboratory, has not been installed, as the risk assessment concluded that the waste acid concentration will not exceed the legal limit (due to intermittent discharge and low frequency). However, the Entity does not have a test report to demonstrate the risk assessment result.</p>

CRITERION	RATING	COMMENT
6.2 Discharges to Water	Conformance	<p>The Entity has established a wastewater inventory to control the Discharges to Water. Industrial wastewater is collected and treated at the Entity's parent company-owned wastewater treatment plant (WWTP) prior to discharge to the local municipal WWTP. The Entity has established a control to neutralise the acid water generated in the laboratory prior to its discharge to the WWTP via the industrial wastewater pipe. The Entity has monitored wastewater quarterly and no excessive results have been detected. The Entity is not a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for water discharges. The Entity has established a continual reduction plan for wastewater discharges and all improvement programs are monitored.</p> <p>Wastewater management information is incorporated in the annual Sustainable Development Report of 2021, page 10: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity conducts regular Spills and Leakages assessments. No high-risk situations are identified, and the Entity has taken preventive action or implemented improvement programs for the potential risks identified.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>The Entity has conducted Leakage assessments every three years or where there are changes in processes, facilities, materials, locations, or equipment. The latest assessment, finalised in May 2022, identified no high risks and the Entity has implemented preventive actions and improvement programs for all the potential risks. Emergency response programs for Spills and Leakages are established and registered with the local environment bureau. No Spills have occurred in the past years and spill drills have been conducted annually. The Entity has installed effective secondary containers for all chemicals. The Entity uses volume in/out records to monitor for leakage in the underground oil tanks, however, the Entity does not regularly check the records to determine if there has been leakage from the underground oil tanks.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Emergency Environment Issue Response Program addresses the management and reporting of Spills. If there is a spill, the ERT (Emergency Response Team) would follow the response process to deal with it accordingly, and spill drills are</p>

CRITERION	RATING	COMMENT
		conducted annually to ensure the process is up to date. The Emergency Environment Issue Response Program defines how the Entity will report Spills to the local authorities and impacted units, to other people immediately and disclose it publicly.
6.4b Reporting of Spills (regular reporting)	Conformance	No spills have occurred in the past years. The spill information for 2021 is published in the annual Sustainable Development Report of 2021, page11: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity's solid waste and hazardous waste management regulations defines the processes to collect and dispose of all Waste. Hazardous Waste is transferred to qualified third parties according to legal requirements. Inventory and disposal receipts are kept for review. The Entity has established continual improvement targets to reduce waste generation and targets are reviewed annually by the senior management team. The Entity has established a labelling system for the Hazardous Waste and all containers have been posted with legal standard labels.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has incorporated Waste management information including waste categories, quantity and disposal methods in the annual Sustainable Development Report of 2021, pages 10 and 11: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
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.

CRITERION	RATING	COMMENT
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	The Entity's scrap and dross classification and management procedure has defined a process to recover and recycle Dross. The Entity has a process to recycle a percentage of the Dross internally with the remainder sent to specialised vendors, at present 100% of Aluminium from Dross is recycled.
6.8b Dross (recycling)	Conformance	Aluminium Dross is recycled and refined by smelters that are owned by the Entity's sister factory. The final Dross waste is sold to another sister factory which transfers the Dross to Aluminium oxide as material of the electrolysis process.
6.8c Dross (review of alternatives)	Conformance	The Entity reviews its Dross recycling monthly to identify improvement programs to reduce the final Dross. The Aluminium Dross is recycled by smelters owned by the parent company (Yunnan Aluminum Co., Ltd) and the final residue is sold to another factory as a material in the electrolysis process. There is no landfill of Dross residue waste.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity assessed the water consumption using a legally qualified third party as part of the Environmental Impact Assessment undertaken when the Facility was founded, which indicated the water source is compliant with legal requirements and approved by the local bureau. The Entity has established water mapping and regularly reviews the updates and changes.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments annually, which have determined the risk as low.
7.2a Water management (management plans)	Conformance	The Entity has annual targets to continually reduce water consumption and has established programs including plans of improvement actions, timeframe and responsible individuals to achieve the targets.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	The Entity has annual targets to continually reduce water consumption and has established programs to achieve the targets. The targets and progress of programs are reviewed monthly.
7.3 Disclosure of water usage and risks	Conformance	The water management and control programs have been published in the annual Sustainable Development Report of 2021: https://ylgf.chinalco.com.cn/xwzx/ywgg/202302/P020230217472934906829.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A biodiversity assessment was undertaken as part of the EIA (Environment Impact Assessment), conducted by a qualified third party. The Entity is located within a government managed industrial zone which is not a Protected Area. There is no evidence to show the Entity has a negative impact on biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity cooperates with the parent company (Yunnan Aluminum Co., Ltd) to establish Biodiversity Action Plans annually. The plans include revegetating mountains to prevent loss of soil and expanding areas of vegetation at the factory.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established action plans for biodiversity management and the plans are consultative and designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported its biodiversity management and outcomes via a Biodiversity Risk Assessment Report available at: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217545055734775.pdf
8.3 Alien Species	Conformance	The Entity has annually assessed the Alien Species and no Material risk has been identified.
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.

CRITERION	RATING	COMMENT
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Policy to respect Human Rights. The policy is included in the Sustainable Development Report of 2021, pages 6 and 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has established a procedure to conduct Human Rights Due Diligence for the supply chain. However, the procedure has not been implemented effectively, and the Human Rights Due Diligence process has not been conducted for five of the nine Recycled Aluminium suppliers that were added in 2022. Due to the impact of COVID-19, the Human Rights Due Diligence did not commence in November 2022 as per the internal plan but was postponed to March 2023.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to Stakeholders. No adverse impacts have been reported and therefore no remedy needed. The grievance channels are published in the annual Sustainable Development Report of 2021, page 7: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met, such as providing sufficient protection to pregnant Workers and nursing mothers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the areas where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the areas where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	As confirmed through the Environmental Impact Assessment report, the Entity does not have any impact on no cultural and sacred heritage.
9.6a Resettlements (avoid or minimise)	Conformance	The resettlements management procedure has been established. As confirmed through the Environmental

CRITERION	RATING	COMMENT
		Impact Assessment report, no resettlement is necessary.
9.6b Resettlements (where unavoidable)	Conformance	The resettlements management procedure has been established. As confirmed through the Environmental Impact Assessment report, no resettlement is necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an ASI Management Manual, which includes the procedure that the Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity has developed a communication channel with the Local Communities, and no complaints from Local Communities have been received. Annual Due Diligence is conducted pertaining to Human Rights for Local Communities and no Material risk has been identified.
9.7b Local Communities (impacts)	Conformance	The Entity is within an industrial park and the nearest communities are 1.5km away. A number of employees are from the local area. The Environmental Impact Assessment report indicates the Facility has installed environmental protection devices, such as air emission treatment facilities, to reduce the impact on the surrounding communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has employed a number of Workers from the Local Communities. The Entity has established plans to support the surrounding communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established an ASI Management Manual, which includes the Entity's commitment to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). Through internal investigation from the Due Diligence, investigation reports and the supplier signed commitments, it was found that no material has come from CAHRAs.
9.9 Security practice	Conformance	The security at the Entity is provided by the parent company (Yunnan Aluminum Co., Ltd). The Entity has established an ASI Manual and Security Code of Conduct to respect Human Rights. All security staff are trained on the Entity's Human Rights Policy and procedure, which addresses anti-harassment, anti-abuse and anti-Forced Labour. All security practices respect Human Rights.

CRITERION	RATING	COMMENT
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 commits itself to respecting the Workers' rights. There are 41 elected Workers' representatives and an association for Workers was established in the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of Workers to Collective Bargaining and to participate in any Collective Bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives can deal with the Workers' concerns with management on behalf of Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity has established processes to ensure no Child Labour is hired and situations of Child Labour (if they occur) are remediated. No Child Labour has been employed by the Entity in past years.
10.2b Child Labour (hazardous)	Conformance	The Entity has an established processes to ensure no Child Labour is hired. No Child Labour has been employed by the Entity in past years. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity has an established processes to ensure no Child Labour is hired. No Child Labour has been employed by the Entity in past years. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI Management Manual and commits itself and expects its Suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. No type of Forced Labour was found in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are employed directly, and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in Forced Labour. No foreign Migrant Workers are used by the Entity, all Workers are Chinese. The Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour. No deposits or security payments are permitted.

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10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction on Workers' movement at the sites.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. The Entity does not hold any original document, passport or permit, only copies of ID in the personal 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 working contract is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has established a policy and procedure on anti-Discrimination during the hiring, promoting and training processes.
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System, and direct and frequent communication with Workers and the representatives of the Worker Councils are established. Interviewed Workers provided feedback on a positive working environment and direct communication.
10.6 Disciplinary practices	Conformance	As per the ASI Management Manual, the Entity does not tolerate any form of punishment or harassment. Suppliers are required to comply with the policy and procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. All disciplinary records are confirmed by both Workers and management. No case of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse has happened in the past year.
10.7a Remuneration (living wage)	Conformance	Wages comply with the legal standard and meet the basic needs of Workers. All employees are enrolled in the social insurance and housing fund. The Entity has provided supplemental retirement insurance to all Workers. All Workers' holiday wages have been paid according to legal requirements.
10.7b Remuneration (method of payment)	Conformance	Payments are documented and submitted to employees' bank accounts according to contract and legal law, no delay in payment occurred in the past 12 months.
10.8 Working Time	Conformance	The Entity has a policy of providing paid payment of annual, sick, marriage, maternity leaves, etc. to Workers according to legal requirements. Working hours are recorded and monitored. The weekly working hours do not exceed industry standards and

CRITERION	RATING	COMMENT
		aggregative working hours do not exceed consolidated working hour system approval requirements. All Workers at least have one day off per seven days. The Entity has established weekly monitoring mechanism to ensure compliance with working hours and working days.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
1.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy as part of the ISO 45001:2018 certified Management System. The certification body conducted a surveillance audit for the Entity in August 2022 and no finding was issued regarding the OH&S Policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OHS& Policy is displayed and published in the Entity's office and on workshop bulletin boards. The Entity briefs Visitors on the OH&S management process and site visit requirements through video demonstration.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established an OH&S Management System and implemented an OH&S Policy with a commitment to comply with laws and applicable international conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an OH&S Policy that indicates the right of employees to refuse to work in an unsafe environment.
11.2 OH&S Management System	Conformance	The Entity has a valid ISO 45001:2018 certification. In the latest OH&S Management System surveillance audit, conducted in August 2022, one minor finding was issued.
11.3 Employee engagement on health and safety	Conformance	The Entity holds regular meetings with the employee representatives. The meetings cover employee OH&S matters and records of communication are maintained. The Entity has established a reward policy for reporting health and safety issues.
11.4 OH&S performance	Conformance	The Entity has established objectives and targets to improve its OH&S performance. Improvement programs have been developed for the objectives and targets. The Entity conducts monthly management reviews to monitor the progress of objectives and programs to ensure they are on track.

Document Control and Version History

Revision	Date	Notes
0	7 July 2021	Initial Certification Audit (Full Certification)
1	16 May 2023	Surveillance Audit