# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## Fujian Nanping Aluminum Co., LTD.

CERTIFICATE NUMBER

319

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

**18 OCTOBER 2023** 

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

17 OCTOBER 2026

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

**CERTIFIED SINCE** 

**18 OCTOBER 2023** 

#### **AUTHORISED BY**

The

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

#### **CERTIFICATION SCOPE**

- I. Foundry Branch of Fujian Nanping Aluminium Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy round ingots.
- 2. Extrusion Division of Fujian Nanping Aluminium Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy profiles for construction.
- 3. Production Department of Fujian Nanping Aluminium Co., LTD., located at No.65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of industrial Aluminium alloy profiles.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

MEMBER NAME	Fujian Nanping Aluminum Co., LTD			
ENTITY NAME	Fujian Nanping Aluminum Co., LTD.			
CERTIFICATION SCOPE	1. Foundry Branch of Fujian Nanping Aluminum Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy round ingots.			
	2. Extrusion Division of Fujian Nanping Aluminum Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy profiles for construction.			
	3. Extrusion Division of Fujian Nanping Aluminum Co., LTD., located at No.65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of industrial Aluminium alloy profiles.			
SUPPLY CHAIN ACTIVITIES	<ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion</li> </ul>			
ASI STANDARD	Performance Standard V3			
AUDIT TYPE	Initial Certification Audit			
AUDIT FIRM	DNV Business Assurance Services UK Ltd.			
AUDIT DATE	• 12 – 14 June 2023			
AUDIT REPORT SUBMISSION	• 3 August 2023			
AUDIT SCOPE	The audit scope covers the activities at Fujian Nanping Aluminium Co., LTD. for the production of alloy round ingot, aluminium alloy profiles for construction and industrial aluminium alloy profiles at the Foundry Branch and both Extrusion Divisions.			
	Supply Chain Activities included in the audit scope:			
	Aluminium Re-melting/Refining			
	• Casthouses			
	Semi-Fabrication     Material Conversion			
	<ul> <li>Material Conversion</li> <li>All relevant criteria in the ASI Performance Standard were included in the audit scope.</li> </ul>			
AUDIT OUTCOME	Certification			

<b>AUDIT METHODOLOGY</b>
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** 

18 October 2023 - 17 October 2026

**NEXT AUDIT TYPE** 

Surveillance Audit

**NEXT AUDIT DATE** 

18 May 2025

**CERTIFICATE NUMBER** 

319



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <a href="https://aluminium-stewardship.ethicspoint.com/">https://aluminium-stewardship.ethicspoint.com/</a>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

#### **ENTITY OVERVIEW**

Fujian Nanping Aluminium Co., Ltd., formerly known as Fujian Nanping Aluminium Factory, was established in 1958 and is a large state-owned company located near Jianxi and Min Juan rivers in Nanping in the northwest of Fujian Province, China. It is now one of the top ten national aluminium production companies in China. The company has a registered capital of 1,028.7 million yuan and with 5,200 employees, including its subsidiary companies. It achieves an annual sales revenue of more than 6 billion yuan.

The company's aluminium industry chain includes the production of various aluminium products, from pre-baked anode aluminium to electrolytic aluminium casting, casting-rolling, aluminium processing, moulds, aluminium strips, and aluminium deep processing. The capacity of aluminium casting and processing exceeds 200,000 tons annually, with plans to increase this capacity to over 300,000 tons with the construction of Nanping Aluminium (Chengdu) Co.

The Entity holds recognitions such as being an "Enterprise Technology Center" acknowledged by the government and a key high-tech enterprise under the "National Torch Plan." The Entity is also recognised for its innovations and has received several honours for its contributions to the aluminium industry.

The Entity incorporates advanced technical equipment and is a leader in various aspects of the aluminium industry, including chain scale, brand building, innovation, standard setting, energy efficiency, emission reduction, and information management. Nanping Aluminium Industry holds an impressive portfolio of over 350 approved patents for inventions, appearances, and utility models from the State Intellectual Property Office, and has developed four national key new products and received 13 awards at the provincial or ministerial level for science, technology, and innovation. It plays a significant role in directing industry standards and is a key contributor to the development of national and provincial standards for aluminium alloy building profiles.

Nanping Aluminium has earned recognition and awards for its contributions, including being named a National May Day Labor Diploma unit, a National Advanced Unit in Spiritual Civilization Construction, and a National Advanced Unit for Equipment Management. It has also been commended for its ethical behaviour, energy-saving efforts, and commitment to environmental sustainability. At the regional level, it has received recognition for its enterprise culture, creditworthiness, and harmonious workplace practices.

#### **MATURITY RATINGS**

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	Medium	Medium	Medium
RISKS	Medium	High	Medium	Medium
PERFORMANCE	High	Medium	Medium	Medium
OVERALL		MED	IUM	

### **FINDINGS**

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes to comply with legal requirements. The legal compliance department is responsible for the implementation of Applicable Laws, regulations and other requirements within the organisation and conducts legal compliance reviews yearly. There are no significant compliance issues within the Entity. Information regarding compliance performance is disclosed in the Annual Sustainability Report:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b501d6230b7.pdf
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Policies and procedures for identifying and preventing Corruption, such as the Guidelines for Anti-Corruption Risk Prevention and Control. In accordance with Applicable Laws and current standards, the Entity aims to mitigate various forms of Corruption, including Extortion and Bribery. Based on the Improper Conduct Register and regular internal control audit reports, there have been no reported cases of Corruption in 2022 and 2023.
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented a Code of Conduct which includes principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among employees, business partners and suppliers. A formal review of the Code of Conduct is conducted annually and reviews the conformance with and effectiveness of the Code of Conduct when there are any changes to the Business that result in significant changes in environmental, social and governance risks, or there are indications of control deficiencies. The Code of Conduct and Supplier Code of Conduct are available for all interested Stakeholders at:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb9447  Oe2.pdf and  http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb8610c  1l.pdf
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented an ASI Management Policy, which includes an Environmental Policy, Human Rights Policy, Health and Safety Policy, and Responsible Procurement Policy. The Policy is communicated to all employees internally and Stakeholders externally at:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497ac9743c99.pdf  The Entity will review the Policy annually as well as when there are any changes to the Entity that bring about significant changes in environmental, social and governance risks, or there are indications of control deficiencies.
2.2a-c Leadership	Conformance	As a member of senior management, the General Assistant Manager of the Entity is the ASI Management Representative and is responsible

CRITERION	RATING	COMMENT
		for the establishment and implementation of ASI Standards within the Entity, the Management Representative is responsible for communicating ASI Policies within the whole Entity. A cross-departmental ASI working group has been established to implement ASI Standards within the Entity, ASI Policies and management procedures are communicated to all employees through various training courses.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and implemented a Social Management System in accordance with the ASI Performance Standard. Social impacts and relevant risks such as risks relating to Human Rights, Occupational Health & Safety (OH&S), and business ethics are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e 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 responsible sourcing requirements on an annual basis. The responsible sourcing requirements can be found in the ASI Policy and be accessed at: <a href="http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497ac9743c99.pdf">http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497ac9743c99.pdf</a> According to the ASI documented management procedure, in addition to the annual periodical reviews, the purchasing Policies will be reviewed as well as when any changes to the Business result in significant changes in environmental, social and governance risks, or there are indications of control deficiencies.
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has implemented ISO14001:2015 and ISO45001:2018 management systems, and environmental aspects, health and safety risk and control plans will be reviewed and modified annually. According to the ASI management procedures, the Entity commits to regularly review the environmental and social impact management plan, with a minimum review frequency of once every five years. Additionally, a reassessment of the environmental and social impact management plan is initiated when there are Business changes or signs of any control gaps leading to significant environmental, social, and governance risks. Since March 2020, the Entity has not undertaken any new construction projects or made significant changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has established and implemented documented procedures to identify and assess the risks to Human Rights and business ethics and has established relevant control measures based on the ASI Performance Standard and associated legal requirements. With respect to Human Rights, a management plan has been established and implemented. The Human Rights Impact Assessment report and management plans are available at:

CRITERION	RATING	COMMENT
		http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb6897 8e4.pdf
		In addition to annual periodical reviews, senior management will review the management plans after any changes to the Business that alter Material Human Rights risk(s) as well as if there is any indication of a control gap. Since March 2020, the Entity has not undertaken any new construction projects or made significant changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity holds a valid ISO 14001:2015 certificate and a valid ISO 45001:2018 certificate. Emergency Response Plans are developed and implemented, and both personnel training and drill records are verified during the Audit. The plan can be accessed here: http://mlfjnp.com/ueditor/php/upload/file/responsibility/6487bbff063 bl.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a procedure known as 'Provisions on Decision-Making and Administration of Critical Business Matters' to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Entity commits to obey Applicable Law and company Policies on redundancies and consult employee organisations at the same time. The suspension process and management procedure will be reviewed in case of any Material environmental, social and governance risk(s) caused by Business changes or any indication of control gap and shall be reviewed annually. No suspension activity has occurred within the last three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure for Mergers and Acquisitions (Investment and Construction Projects Management Procedure), senior management will conduct Due Diligence processes for mergers and acquisitions. If Mergers and Acquisitions occur in future, review its environmental, social and governance practices related to ASI Performance Standard, including those associated with Historic Aluminium Operations. The Entity is a State-owned group enterprise, no such activity has occurred within the last three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for Closure, Decommissioning and Divestment (Provisions on decision-making and administration of critical business matters). Senior management will review environmental, social and governance practices related to this Standard in the planning process for closure, decommissioning and divestment in they occur, and develop a plan for monitoring Material environmental, social and governance impacts. The Entity is a State-owned group enterprise, no such activity has occurred within the three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has established and implemented a Materiality screening process, and key concerns of Stakeholders are identified, such as air pollution, Hazardous Waste management, etc. The management approach and performance information of Material issues are disclosed in the annual Sustainability Report and Social Responsibility Report available at:

RATING	COMMENT
	http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b501d6230 b7.pdf
Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in the Annual Sustainability Report. There are no significant fines or penalties imposed on the Entity as reported in 2022. Disclosures are available at:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b501d6230b7.pdf
Conformance	The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in the annual Sustainability Report, available at:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b501d6230b7.pdf
Conformance	The Entity has established and implemented a complaints/grievance receiving, and handling mechanism. The complaint resolution process is specified in the management procedure and is available at: http://mlfjnp.com/opinion
	No significant complaint has been received by the Entity. Complaints/grievances and Stakeholders' concerns and resolution approach are reviewed in the ASI management review meeting annually. The Entity will review the complaints resolution after any changes to the Business that alter Material environmental, social and governance risks, and if there is any indication of a control gap occurred.
Conformance	The Environmental Life Cycle Assessment (LCA) has been conducted and documented, and the Environmental LCA report is available at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497acb604079.pdf
Conformance	The Entity has assessed the cradle-to-gate life cycle impact of their main products. The Entity has prepared an LCA report according to the principles in ISO 14040, ISO 14044, and PCR: QCQM EPD130205:2021 Standard. The condensed report discloses key information about the LCA, such as underlying assumptions, system boundaries, etc. The summary of the report is available at: <a href="http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497acb604079.pdf">http://mlfjnp.com/ueditor/php/upload/file/responsibility/6497acb604079.pdf</a> The Entity confirms that subject to the terms of the relevant contract with customers, adequate cradle-to-gate LCA information on Aluminium products will be made available to the customer upon
Conformance	request. Interviews and document review confirm there have been no requests to date.  The Entity has integrated relevant objectives in the design and
	Conformance  Conformance  Conformance

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The target of the process scrap for collection, recycling and/or re-use is defined as 100%. Management procedures of 'Aluminium Process Scrap management regulation' and 'Recycled material category and re-using guide' are developed to ensure the target achievement. The Entity categorises and recycles Aluminium scrap generated from the production process, as well as the Aluminium scrap provided by external suppliers, based on the alloy series for recycling and utilisation.  The Entity has adopted technical and management measures to reduce the generation of Aluminium Process Scrap within its
		operations. They are collected, recycled and/or re-used, and the target of 100% collection, recycling and/or re-used is almost achieved.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has developed a strategy to use Recycled Aluminium with the target in 2030 for the consumption of Recycled Aluminium to reach 0.2 million tonnes per annum, equal to 45%-55% total of the annual raw material consumption by the Entity. The Entity reviews the achievements of the use of Recycled Aluminium against the target annually and adjusts the strategy, target and plan following the management review meeting. The recycling strategy is available at: <a href="http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb3715b61.pdf">http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb3715b61.pdf</a>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed a strategy to use Recycled Aluminium with the target in 2030 for the consumption of Recycled Aluminium to reach 0.2 million tonnes per annum. The Entity has qualified more than 30 recycling Aluminium suppliers, the Recycled Aluminium used at the Entity is mostly purchased from these Recycled Aluminium suppliers. As there are no complete local, regional, or national collection and recycling systems for Aluminium scrap in China, the Entity works with their customers to determine how best to improve the recycling rate of products at End of Life.
5. GREENHOUSE GAS EMISSION	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non- Conformance	The Entity is classified by the local authority as a major energy-consumer and Greenhouse Gases (GHG) emissions unit. The Entity has calculated its GHG emissions for 2022, which has been verified by a qualified third party before being reported to the authority. However, it was identified the Scope 3 emissions in the GHG verification report did not include carbon emission data for purchased Aluminium ingots.
		The information on energy use and GHG emissions by source for 2022 is available at:  http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb 2624d43.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has established GHG emissions reduction targets regarding their commitment to green and low-carbon development while being consistent with a 1.5°C warming scenario. All sites within the Entity have defined their GHG emission reduction plans. These plans and pathways are available at:  http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482ea f7cfda6.pdf  There is a mechanism to review the GHG Emissions Reduction Plans annually and a review of the pathways is also undertaken if required.
5.4 GHG Emissions Management	Conformance	The Entity has compiled its GHG Emission Reduction Plans to define the management approaches to GHG emissions with a focus on energy management. Site observations, document reviews and interviews confirm that the Entity adheres to a 'Plan-Do-Check-Action approach' to manage energy consumption and monitor the Management System performance to achieve the outcomes within the GHG Emission Reduction Plans.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	Following the Environment Management System and legal requirements, the Member identifies, assesses and quantifies Material Emissions to Air from its activities, and implements the control plans to minimise exposure to, and impacts from Emissions to Air. The Entity monitors and reviews the effectiveness of the control plans periodically and when change or non-conformance is identified. The Entity publicly discloses its environment performance information, pollutant discharge information, monitoring results and the operational status of the environment protection Facilities and the Air Emission Control Plan at:  http://permit.mee.gov.cn/perxxgkinfo/xkgkActionlxkgk.action?xkgk=get xxgkContent&dataid=2053a2c47038473f987aa8e3316e82f9  http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6487e86eeb416.pdf
6.2a-g Discharges to Water	Conformance	The Entity has developed an approved EIA report and a Pollutant Discharge Permit, and all wastewater must be treated in the Sewage treatment station and discharged into the external drainage/water system. The Entity collects, treats, and recycles all wastewater. The quarterly monitoring results demonstrate that the water quality meets the required recycling water standards. The monitoring results of surrounding soil, surface water and underground water, demonstrated that there were no pollutants identified at any of the Entity's sites. The target and management program is available at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6487e866el4bd.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	An assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil is conducted regularly by the Entity through a risk assessment process that is incorporated into the Entity's Environmental Management System. The relevant management plan has been established and implemented for both sites. The Entity reviews the plans periodically and if needed after a Spill and/or Leakage event or Major Changes in Business occurs.  The identification and risk assessment report of Spills and Leakages is disclosed at:

CRITERION	RATING	COMMENT
		http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482eacd34538.pdf
		The latest version of the emergency response plan for environment incidents is disclosed on the Member's official website at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6487bbf f063b1.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and Leakages is defined in the Entity's environment protection management procedure. The Entity's sites are required to report the accident to the local government agency and the affected parties if Spills or Leakages occur however, none have occurred in the past three years. The latest version of the management plan is available at:  http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482eacd34538.pdf
6.5a-c Waste Management and Reporting	Conformance	Waste management is addressed by the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates the Material impacts by re-using and recycling waste. The procedure for the disposal of Hazardous Waste adheres to applicable legal requirements. The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Waste generated from its activities in 2022 at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6487e85e85721.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Dross generated at all of the Entity's sites is managed in compliance with the applicable legal requirements, and no Leakages are observed and/or reported. The Entity has a Dross treatment Facility to maximise the recovery and recycling of Aluminium by treatment of Dross and Dross residues. The Entity does not landfill Dross residues. The Entity is investing to increase the capacity of the Dross treatment Facility to increase their contribution to the Circular Economy (CE) and to mitigate the environmental impact of Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	In the Entity's Environmental Impact Assessment, the Entity has identified and, documented water withdrawal and use by source and type. The Entity has assessed water-related risks, considering the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures. The risk level identified is low, and there are no Material or significant water-related risks in the Entity's Area of Influence. The assessment report of Water-Related Risks and Water Inventory Map, available at: <a href="http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/64910d1dc6d91.pdf">http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/64910ce64131f.pdf</a>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as there are no Material water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Biodiversity and Ecosystem Services Risk and Impact assessment are included in the Environmental Impact Assessment (EIA) conducted by qualified third parties, and the EIA reports are approved by the local Environment Protection Agency. The approved EIA reports demonstrate that there are no biodiversity-sensitive areas located within the Entity's Area of Influence and the risk level is low. The Entity is located in the industrial zone planned by the local government and has an effective Environment Management System.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has identified the risks relating to the introduction of Alien Species for both their operational and logistical activities. The result is the risk is low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	As outlined in the ASI Performance Standard Management Manual, the Entity is committed to not exploring or developing New Projects or making Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	As outlined in the ASI Performance Standard Management Manual, the Entity commits to protecting the environment. There are no Protected Areas adjacent to the Entity's Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a Business Code of Conduct, affirming its commitment to uphold Human Rights, promote gender equality, and adhere to the UN Guiding Principles on Business and Human Rights.  The Entity regularly publishes the 'Human Rights Impact Assessment Report' which includes details on the approach taken to engage with

CRITERION	RATING	COMMENT
		affected communities and the mechanisms in place for resolving complaints.
		Based on the annual Human Rights Impact Assessment Report, records from management review meetings and Stakeholder grievance records, the Entity's operations have not resulted in or contributed to any significant adverse Human Rights impacts.  Nevertheless, should any negative impact on Human Rights be identified or reported, the Entity will provide appropriate remedies or cooperate through legitimate processes.
		The Code of Conduct is available at:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb9447  0e2.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established and implemented a comprehensive management procedure to protect female employees, demonstrating its commitment to uphold and promote gender equity and women's empowerment throughout the group enterprise. The Entity has made public the Gender Equity Policy and performance in safeguarding the rights of female Workers. These can be accessed through the Human Rights Impact Assessment Report: (http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb68978e4.pdf) and the Annual Sustainability Report: (http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b50ld6230b7.pdf). No complaints related to gender equity have been received within the past three years.
9.3a-i Indigenous Peoples	Not Applicable	The Entity has established and implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. The assessment report confirmed that there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	The Entity has developed a Stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for New Projects and significant modifications to existing projects. The assessment report confirmed that there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify and assess any presence of cultural and sacred heritage sites in or near the Entity's Area of Influence and aims to minimise any potential impact on these sites. Currently, all new and existing projects of the Entity have undergone Environmental Impact Assessments (EIA) and social assessments. Through these assessments, it has been determined that there are no sacred or cultural heritage sites within the Area of Influence of the Entity.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has established new project investment development management procedures whereby all project development must be approved by the local authority. Currently, all existing projects are located in an industrial zone developed by the local government, no resettlement is required as no New Projects have been developed since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a Stakeholder engagement process to actively identify and address the primary concerns of the affected population and organisations. To effectively respond to these concerns, the Entity has developed a range of management plans. These plans are regularly reviewed on an annual basis, and any necessary improvements are identified and implemented. The Entity's performance in executing these plans and actions is disclosed in its annual Sustainability Report, available at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b50Id6230b7.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management System s	Conformance	The Entity has established and implemented Management Systems, which encompass a Supply Chain Policy, with defined responsibilities and resources allocated including information gathering mechanisms, and active engagement with suppliers. The Entity's commitment to responsible sourcing is publicly disclosed in the ASI Code of Conduct and the Entity's annual Sustainability Report. The Purchasing Policy and the grievance channel are outlined in these documents, available at:  ASI Supply Chain Code of Conduct: <a href="http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb8610c">http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb8610c</a> 11.pdf
		Annual Sustainability Report: http://mlfjnp.com/ueditor/php/upload/file/responsibility/64b501d6230 b7.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity conducts regular risk assessments to identify and evaluate potential risks within the supply chain. The Entity does not use conflict minerals and ensures that no materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs). Furthermore, the Entity is committed to addressing critical Human Rights issues, such as Child and Forced Labor, and ensures that these issues are not present within the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a Supply Chain Code of Conduct and commits to refraining from using conflict minerals. The Entity maintains ongoing vigilance over the risk of conflict minerals within its supply chain. It pledges that should high-risk concerns be identified, appropriate measures will be taken to mitigate such high-risk issues.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has developed and implemented a supply chain Code of Conduct, which includes provisions related to social responsibility. As part of its commitment to responsible sourcing, the Entity conducts regular audits of its supply chain to assess compliance with the Code of Conduct and determine if conflict minerals are used in products or production processes. The risk assessment records, and supplier audit

CRITERION	RATING	COMMENT
		reports confirm no critical issues have been identified, and there is no evidence of conflict minerals being used in the supply chain. The risk associated with conflict minerals has been assessed as low.  Nevertheless, the Entity maintains a continuous improvement plan to further enhance its practices and ensure ongoing adherence to responsible sourcing principles.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non- Conformance	The Entity has implemented the ASI Code of Conduct throughout the supply chain. It has conducted risk assessments and social responsibility audits to ensure compliance. The Entity is committed to ensuring that no conflict materials are used in its entire supply chain and that no materials are sourced from CAHRAs. However, it was identified the Entity currently does not publicly disclose information and performance related to the topic of conflict materials.
9.9 Security practice	Conformance	All security guards employed by the Entity are committed to upholding Human Rights in their activities. Strict Policies ensure that no body searches are permitted, and security guards are expected to undertake their duties in a humanely. Comprehensive training is provided to all security guards to ensure they understand their responsibilities and the importance of respecting Human Rights. No grievances or complaints have been received regarding the conduct of security activities, indicating a positive track record.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, due to restrictions on Freedom of Association and Collective Bargaining in China. The All-China Federation of Trade Unions is the sole legal organisation for trade unions. All employees of the Entity have joined the trade union and a Collective Bargaining Agreement is signed and approved by senior management.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's Senior management is committed to respecting the Right to Freedom of Association and Collective Bargaining. This commitment is demonstrated through various practices and processes. Workers' representatives are democratically elected by employees every five years, ensuring their autonomy and representation. Regular Workers representative congress meetings are held annually, providing a platform for open communication and discussion between Workers and senior management. During these meetings, Workers' concerns and issues are addressed and deliberated. Furthermore, a Collective Bargaining Agreement is established between the Entity and the Workers' representatives. This agreement is signed and approved by the senior management, solidifying their commitment to fair and collaborative labour relations.
10.2a Child Labour	Conformance	In accordance with Chinese law, Child Labour is strictly prohibited, and the legal minimum working age at the Entity is 16 years old. The Entity has established and implemented Policies that explicitly prohibit the use of Child Labour and ensure the protection of young Workers including an age verification procedure. At present, no individuals are classified as Child Labour, nor are young Workers hired at the Entity.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy that strictly prohibits Forced Labour, including Human Trafficking. This Policy applies not only to the Entity

CRITERION	RATING	COMMENT
		but also to its suppliers, emphasising the importance of compliance with the prohibition of Forced Labour, Modern Slavery, and Human Trafficking. There are no instances of illegal wage deduction, Debt Bondage, payment of debt, or any other indicators of Forced Labour that have been identified or reported within the Entity. Detailed information regarding the Policy and its implementation can be found in the Entity's Code of Conduct and Modern Slavery Statement. These documents are available at:  Code of Conduct:  http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb9447  Oe2.pdf  Annual Modern Slavery Statement: http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482ea95dfb 52.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is fully committed to promoting Non-Discrimination in all aspects of its operations and no cases of Discrimination have been reported within the Entity. This commitment is reflected in the recruitment process, where advertisements and training plans emphasise that decisions are solely based on the candidate's ability to meet the job requirements, without consideration of personal characteristics or any form of Discrimination. Furthermore, feedback from interviewed Workers confirms that they feel equal and treated fairly (e.g., equal pay for the same work).
10.5 Communication and engagement	Conformance	Regular and open lines of communication are established between management, workers, and worker representatives. These include an internal system hotline and suggestion boxes, or via worker representatives. These mechanisms are communicated to the workforce, enabling them to freely raise any concerns and grievances they may have regarding working conditions. They can also seek resolution for any workplace and compensation matters, without fear of retaliation, coercion, or mistreatment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies explicitly prohibiting any form of harassment or bullying. Union representatives have been actively engaged in the formulation of relevant Policies. These Policies have been incorporated into the Collective Agreement signed between the Union and the Entity. To ensure widespread awareness, an informative brochure has been developed and distributed to all employees. The Entity's Code of Conduct addresses this matter, and regular training sessions are conducted to reinforce these principles among employees.  The Code of Conduct is available at: <a href="http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb9447">http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb9447</a> Oe2.pdf
10.7a-c Remuneration	Conformance	All employees have complied with legal regulations by entering into labour contracts with the Entity within the first month of their employment. These labour contracts clearly outline the terms of employment and the respective rights and obligations of both parties. Each employee is provided with an original copy of their individual labour contract.  The wage structure is unambiguously outlined, with the basic wage exceeding the local legal minimum requirement. Overtime compensation adheres to relevant legal obligations. Mandatory

CRITERION	RATING	COMMENT
		allowances are provided to all Workers, ensuring their essential needs are met. Additionally, all employees are enrolled in the obligatory social insurance program.
		The payment of wages is documented and promptly paid to all Workers via bank transfer on the 15 <sup>th</sup> day of the subsequent month. Comprehensive information regarding wages, allowances, Overtime compensation, and deductions can be readily accessed through an internal system.
10.8a-c Working Time	Minor Non- Conformance	Most production workshops throughout the Entity implement a two-shift rotation system with three teams, with the day shift from 08:00 to 20:00 and the night shift from 20:00 to 08:00 the next morning. At the same time, some teams follow a three-shift rotation system. Office staff work from 8:00 to 17:00, five days a week, totalling 40 hours per week.  Working hours are recorded and monitored and most Workers' monthly Overtime working hours do not exceed the legal monthly limit All Workers are entitled to one day off per week, in addition to rest days and statutory holidays. The Entity ensures that Workers do not work for more than 8 hours per day on average over a 6 month period.
		However, it was identified the Entity has installed a facial recognition attendance system only at the main entrance of the plant, while no attendance system is installed in or near the workshops. This has led to inaccuracies in the calculation of daily attendance working hours of Workers, and as a result, the system cannot track employees' off-duty time, such as lunch breaks. As a result, the system inaccurately calculates employees working hours on-site.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their Rights and has established cooperation and communication with the Workers at all its production plants through the webpage, on the intranet, on boards and signs and in the Collective Agreement. National laws and regulations in China are respected and followed.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non- Conformance	The Entity has implemented, maintains and continually improves an Occupational Health and Safety (OH&S) Management System. The Entity holds a valid ISO 45001:2018 certificate. Site observations, document review and interviews with management and Workers demonstrated that the OH&S Management System is effective. However, it was identified the management of chemicals does not comply with OH&S requirements.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically reviews the OH&S Management System through quarterly safety meetings, annual legal compliance evaluation, annual internal audit against ISO 45001:2018, and management review meetings. When any indication of a control gap is shown, a review is conducted to assess if the potential corrective and/or preventive actions should be implemented. The achievement of OH&S objectives and targets for 2022 and the comparative analyses of performance with peer Businesses and leading practices are available at: <a href="http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482ea8ee732f.pdf">http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/6482ea8ee732f.pdf</a>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a system for Workers' consultation and participation in Health and Safety. Workers may take part in the raising and discussing of OH&S issues in the Entity's Health and Safety Committee meetings which are held quarterly. Workers are encouraged to report their concerns or advice on OH&S issues or via their Worker representative, the management responds to the concerns and advice on OH&S issues from Workers.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 October 2023	Initial Certification Audit – Full Certification