

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Shandong Yuhang Special Alloy Equipment Co., Ltd

CERTIFICATE NUMBER

334

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

20 NOVEMBER 2023

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

19 NOVEMBER 2026

ASI ACCREDITED  
AUDITING FIRM

BUREAU VERITAS  
CERTIFICATION

CERTIFIED SINCE

20 NOVEMBER 2023

## AUTHORISED BY

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Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at*  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

## CERTIFICATION SCOPE

Manufacturing of Aluminium rod,  
Aluminium alloy industrial profile,  
and Aluminium alloy accessories,  
which includes Aluminium re-  
melting/refining and casthouse  
processing at the Shandong  
Yuhang Special Alloy Equipment  
Co., Ltd production plant (China).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Shandong Yuhang Special Alloy Equipment Co, Ltd
ENTITY NAME	Shandong Yuhang Special Alloy Equipment Co, Ltd
CERTIFICATION SCOPE	Manufacturing of Aluminium rod, Aluminium alloy industrial profile, and Aluminium alloy accessories, which includes Aluminium re-melting/refining and casthouse processing at the Shandong Yuhang Special Alloy Equipment Co, Ltd production plant (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li><li>Other manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>7 – 11 August 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>18 September 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers the manufacturing of Aluminium rod, Aluminium alloy industrial profile, and Aluminium alloy accessories at the Shandong Yuhang Special Alloy Equipment Co, Ltd production plant (China).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li><li>Other manufacturing or sale of products containing Aluminium</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li></ul>

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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 20 November 2023 – 19 November 2026

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 19 May 2025

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CERTIFICATE NUMBER 334

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

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.

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## ENTITY OVERVIEW

The Shandong Yuhang Special Alloy Equipment Co., Ltd facility was established in 2011 and manufactures Aluminium rod, Aluminium alloy industrial profile, and Aluminium alloy accessories. The Entity is located within an industrial park developed by the local government and the area under management is approximately 268,800 square meters. The Facility includes on-site accommodation, recreation facilities, canteen, workshop and laboratory and chemical storage.

The Entity employs approximately 435 employees on site, and the majority of employees are from the local area. The Entity is in close contact with surrounding communities.

## 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
<b>SYSTEMS</b>	Medium	Medium	Medium	Medium
<b>RISKS</b>	Medium	Medium	Medium	Medium
<b>PERFORMANCE</b>	Low	Medium	Medium	Medium
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has established a Laws and Regulations Control Procedure, and complies with national and international laws. It has detailed descriptions to conduct audits and lists of all Applicable Law. The EHS (Environment, Health and Safety) Department and Administration Department are responsible for the collection and assessment of Applicable Law at least annually. However, not all relevant laws and regulations have not been included in the Procedure.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-corruption and Anti-bribery Management Procedure, which addresses the requirements of anti-Bribery and anti-Corruption. The anti-Bribery management team has been established and undertakes regular assessments. The Bribery risk assessment level standard has been established and employees have been regularly trained. The Administration Department evaluates the implementation of anti-Bribery efforts annually to determine whether anti-Bribery measures are sufficient and effective, and the Entity's status of Bribery risk.
1.3a-e Code of Conduct	Conformance	The Entity has formulated a Code of Conduct, including environmental, social and governance principles. The Entity undertakes annual internal audits and management reviews to review the Code of Conduct. Updates are made as necessary, including in response to any change in law and business trends. Awareness of the Code of Conduct for staff is raised through various measures, including meetings and training. The ASI Code of Conduct is publicly available on the Entity's website: <a href="https://www.yuhangalloy.com/data/download/202309/01/0001a3cd15499fb06e93e802bc68f322.pdf">https://www.yuhangalloy.com/data/download/202309/01/0001a3cd15499fb06e93e802bc68f322.pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has established a Governance, Environmental and Social Policy, that is approved by the General Manager and made publicly available: <a href="https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf">https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf</a>  However, the Policy is not communicated to Workers clearly and the Entity did not provide the related training for Workers in accordance with its plan.
2.2a-c Leadership	Conformance	A senior Management Representative has been appointed and this role has overall responsibility and authority for ensuring conformance with the ASI Standard. The responsibility and authority are clearly defined, including having sufficient authority to provide needed resources to establish, implement, maintain and improve the Entity's Management Systems.
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.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented an integrated Management System. The Entity has obtained ISO 14001:2015 and ISO 45001:2018 certification. Also, the SA8000 Social Management System and ASI Management System have been established. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Policy is reviewed at least every five years or after any changes to the Business that alter changes in the nature of the risks. The Entity's Purchasing Policy is accessible via the Governance, Environmental, Social and Procurement Policy:  <a href="https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf">https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf</a></p> <p>Responsible sourcing is implemented by the Entity through the signing of ASI Commitment Letters, supplier assessments and emphasis on suppliers to implement the ASI Performance Standard requirements.</p> <p>However, the Entity does not implement the Supplier Management Procedure effectively, with some suppliers not managed according to the internal procedure, such as ASI Commitment Letters not signed or assessments not conducted.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be undertaken as a part of mandatory reviews of project documentation by responsible state bodies.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be undertaken as a part of mandatory reviews of project documentation by responsible state bodies.
2.7a-f Emergency Response Plan	Conformance	The Entity holds a valid ISO 14001 certificate and ISO 45001 certificate. Emergency Response Plans are developed and implemented, and reviewed every five years, or after any changes to the Business that alter the nature or scale of emergency incident risk, in accordance with Chinese legal requirements. Records of personnel training and emergency drills conducted are maintained. The Emergency Response Plan is publicly available at: <a href="https://www.yuhangalloy.com/data/download/202309/01/24a891857f757ad26966b60e84e1da80.pdf">https://www.yuhangalloy.com/data/download/202309/01/24a891857f757ad26966b60e84e1da80.pdf</a>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan that addresses situations where it may have to suspend or significantly alter operations due to conflict, pandemics, natural disasters, cyber-attack and other scenarios. This plan was successfully implemented during the covid pandemic conditions and demonstrated the readiness of the organisation to resile factors outside its control, and the adequacy of its resources.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the Mergers and Acquisitions Management Procedure. Until now, no Mergers and Acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There are no closures, decommissioning and divestments planned for the future. When applicable, activities around closure, decommissioning and divestment will be driven by Corporate functional teams with conducting a review of environmental, social and governance consequences and consultation, where possible, with the participation of Affected Populations and Organisations.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity has disclosed an annual Sustainability Report that describes their sustainability approach and summarises their environmental and social impacts:  <a href="https://www.yuhangalloy.com/data/download/202309/01/7456a79b94f96a49c62234b155f087e8.pdf">https://www.yuhangalloy.com/data/download/202309/01/7456a79b94f96a49c62234b155f087e8.pdf</a></p> <p>However, the quality and level of detail provided of the Entity's Sustainability Report is not adequate and quantitative data was not included.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>No non-compliance or liabilities are disclosed in the Entity's Sustainability Report. No such cases have been raised by the relevant government agencies, as per the government-related and non-governmental websites:  <a href="https://www.gsxt.gov.cn">https://www.gsxt.gov.cn</a>  <a href="https://www.qcc.com">https://www.qcc.com</a></p>
3.3a-c Payments to Governments	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 Financial Audit Report, and tax payment certificates are available.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established and operated a Stakeholder complaints, grievances and requests procedure, which provides the Entity's contact telephone number, email address, suggestion box and other information to Stakeholders by means of public board, accepting information inquiries, complaints and appeals from all parties. The Human Resources Department monitors the requests and complaints of Stakeholders and has an appropriate resolution mechanism in place.
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes for Life Cycle Assessment (LCA). LCAs for all related Products have been completed according to the Entity's LCA management procedure and the LCA report demonstrates that the defined procedures and process are followed accordingly. Please refer to the Product Life Cycle Report, available at:  <a href="https://www.yuhangalloy.com/download-cat-1.html">https://www.yuhangalloy.com/download-cat-1.html</a></p> <p>However, the quality of, and level of detail provided in the LCA report was not adequate and does not completely fulfill the requirements of ISO 14040 and ISO 14044.</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has provided LCA information on its Aluminium Products. LCA studies are available upon customer request and the Environmental Life Cycle Assessment Report is available at: <a href="https://www.yuhangalloy.com/data/download/202309/01/2c85717af58cfb3ee4a20c87cdd17e84.pdf">https://www.yuhangalloy.com/data/download/202309/01/2c85717af58cfb3ee4a20c87cdd17e84.pdf</a>
4.2 Product Design	Conformance	The Entity has established and implemented a Product design procedure, and integrated relevant objectives into the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and targets 100% of scrap for collection, recycling and/or re-use. The Entity has a scrap and Dross classification and management procedure to classify and dispose of the different types of Aluminium scrap. All Aluminium scrap is separated by alloys and sent to different smelters. The Entity maintains the related records.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has implemented a recycling strategy, which includes specific timelines, activities and targets. The Entity is communicating with its main customers to discuss improvements to the recycling rate of Products at End of Life. The Entity has publicly disclosed the recycling strategy on its website: <a href="https://www.yuhangalloy.com/data/download/202309/01/db0332f81797bb167479dd69eb55ab90.pdf">https://www.yuhangalloy.com/data/download/202309/01/db0332f81797bb167479dd69eb55ab90.pdf</a>
4.4d Collection and Recycling of Products at End of Life	Conformance	There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity is working with its customers to decide how to improve the recycling rate of Products at End of Life. Recycling contracts are in place with customers to collect the scrap of Products at End of Life and related recycling records are kept.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has accounted for and publicly disclosed Material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis in the Greenhouse Gas Verification report: <a href="https://www.yuhangalloy.com/data/download/202310/11/2b8a0e6604e2a03bcf490215088c9982.pdf">https://www.yuhangalloy.com/data/download/202310/11/2b8a0e6604e2a03bcf490215088c9982.pdf</a>  The GHG emissions data are verified by a third party. However, the published emissions data within the business boundary are too general and emission factors used are not disclosed.
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	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan with targets covering a five year period. For 2023, the Entity's target is to reduce GHG emissions per product based on the 2022 level:  <a href="https://www.yuhangalloy.com/data/download/202309/01/a46e0b3a9ed442033e6927db21db87b4.pdf">https://www.yuhangalloy.com/data/download/202309/01/a46e0b3a9ed442033e6927db21db87b4.pdf</a></p> <p>The main strategy is to reduce unnecessary electricity consumption and increase the ratio of renewable energy. The Entity reviews the Plan annually or as a result of any changes to the Business that alter baselines or targets.</p> <p>However, the GHG Emissions Reduction Pathway does not align with a 1.5°C warming scenario, nor has an 'end point' target for 2050.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed an Energy Management System certified to ISO 50001 and has implemented the corresponding GHG Management System, which includes related tools, database, inventory and targeted emission reduction pathways. The Entity has implemented a GHG management procedure and emission source identification table to monitor GHG emissions and achieve performance aligned to the GHG Emissions Reduction Plan and targets.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are quantified in the Entity's Environmental Impact Assessment report. Treatment facilities are built and used. Air emissions are monitored regularly and emissions meet the local legal emission limit. The Entity has implemented a plan to minimise exposure to, and impacts from, Emissions to Air:  <a href="https://www.yuhangalloy.com/data/download/202309/01/0776fb2013ce2133b0267fbab7686789.pdf">https://www.yuhangalloy.com/data/download/202309/01/0776fb2013ce2133b0267fbab7686789.pdf</a></p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are addressed and managed within the Entity's Environmental Management System. The Entity has established water reduction targets and a related plan to minimise adverse impacts. The monitoring reports for wastewater confirm major pollutants are monitored and demonstrates that discharges meet the local legal discharge limits. The Entity has implemented a plan to minimise exposure to, and impacts from, Discharges to Water:  <a href="https://www.yuhangalloy.com/data/download/202309/01/0776fb2013ce2133b0267fbab7686789.pdf">https://www.yuhangalloy.com/data/download/202309/01/0776fb2013ce2133b0267fbab7686789.pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity conducts regular Spills and Leakages assessments with leak risk factors identified. No high-risk situations have been identified and the Entity has taken preventive action or implemented improvement programs for potential risks identified. Assessment and management plan of Spills and Leakage is defined in the Environmental Management System and follow the control measures in the list of spill risk factors.</p> <p>Major Spills and Leakages are managed and communicated by the Emergency Response Team (ERT). The assessment and management plan are reviewed at least annually, and is disclosed on the website:  <a href="https://www.yuhangalloy.com/data/download/202309/01/f96c33d5d3b6155d1c9ac9c919fe5bd7.pdf">https://www.yuhangalloy.com/data/download/202309/01/f96c33d5d3b6155d1c9ac9c919fe5bd7.pdf</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's Emergency Response Plan and response guide defines the procedure for the management and reporting of Spills. For Spills, the</p>

CRITERION	RATING	COMMENT
		<p>ERT adheres to the response process to respond accordingly. Drills are conducted annually to ensure the process is up to date.</p> <p>No Spills have occurred in the past few years. In accordance with the Entity's procedures, Spills are reported to the local authorities and impacted units and impacted persons immediately and subsequently disclosed in the annual Continual Development Report, which is available upon request.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's Waste Management Procedure defines the processes to collect and dispose all Waste. The Entity has continual improvement targets to reduce Waste generation per unit, and targets are reviewed quarterly by the management team. The annual quantities of Hazardous and Non-Hazardous Waste generated by the Entity and the associated disposal methods are disclosed:</p> <p><a href="https://www.yuhangalloy.com/download-cat-1.html">https://www.yuhangalloy.com/download-cat-1.html</a></p>
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	<p>The Entity's Dross Management Procedure defines the process to collect and recycle Aluminium Dross prior to being sent to external processors. The Entity recycles the Aluminium internally. The Entity reviews its Dross recycling management monthly to seek improvements to reduce the final Dross. The final Aluminium Dross is recycled by a qualified contractor and is used as a material. There is no landfilling of Dross residue.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has undertaken a water-related risk analysis, including water balance, to determine and map the source and type of water it abstracts and uses. The Entity has developed a water balance statistical data table for 2022, water resources management goals and plans, and a water balance chart. The Entity has conducted water risk assessments. The water risk assessment considered the Entity's industrial park location, nearby lands and waterways risk in their Area of Influence, and determined the level of water-related risk as low:</p> <p><a href="https://www.yuhangalloy.com/data/download/202309/01/60a126dc976bc8261dc638f25edc5f08.pdf">https://www.yuhangalloy.com/data/download/202309/01/60a126dc976bc8261dc638f25edc5f08.pdf</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there were no significant water-related risks identified in the Entity's Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has established procedures for the protection of Biodiversity. A biodiversity risk assessment report has been prepared. The Entity is located in an industrial park developed by the local government, there is no protected flora or wildlife in this area. There is no significant risk of biodiversity impact.</p>

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment documented the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment documented the risk and potential impacts on Biodiversity as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment documented the risk and potential impacts on Ecosystem Services as low.
8.4 Alien Species	Conformance	The Entity has established procedures for the protection of biodiversity, which includes relevant requirements for evaluating and controlling the risk of Alien Species. As confirmed by the Biodiversity risk assessment report, the only source which could introduce Alien Species is the wooden pallets used for product packaging. All pallets are fumigated before using to prevent introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has detailed its commitment to not explore or develop New Projects in World Heritage Properties in its ASI Performance Assurance Manual. The Entity is located in an industrial park developed by the local government and there are no World Heritage Properties in the area.
8.6a-d Protected Areas	Conformance	The Entity has detailed relevant requirements for Protected Areas in its ASI Performance Assurance Manual. The Entity is located in an industrial park which was developed by local government. There are no Protected Areas in the area.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has established a Governance, Environmental and Social Policy, which includes a commitment to respect Human Rights and employees' civil rights and to eliminate Discrimination. The Policies are reviewed at least every five years or as a result of the annual HSE and social risks assessment, and are available for internal and external Stakeholders:</p> <p><a href="https://www.yuhangalloy.com/download-cat-1.html">https://www.yuhangalloy.com/download-cat-1.html</a></p> <p>The Entity has established a Human Rights Due Diligence procedure, conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report. No adverse Human Rights impacts have been reported since the Entity's establishment and therefore remediation is not required.</p> <p>The Human Rights Due Diligence process addresses the Entity's supply chain. However, a sample of assessments determined that some suppliers have not yet completed the Entity's Human Rights Due Diligence assessment.</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed a Women's Protection Management Procedure that addresses the protection of women's rights and interests. The Entity has clarified the legitimate rights of women and implemented control measures to ensure rights are met. No complaint has been received from women Workers. Women workers know their rights. The Entity's Gender Equality Project Development Plan is reviewed annually and disclosed on the website: <a href="https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf">https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as 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	This Criterion is not applicable to the Entity, as 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 to the Entity, 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 Cultural and Sacred Heritage Protection Management Procedure. However, based on the Construction Project Environmental Impact Report (by Zouping Environmental Science Research Institute), the Entity is located in an industrial park without any cultural or sacred heritage sites and values.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no cultural and sacred heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes that may cause displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented an Affected Populations and Organisations Management Procedure to address the legal and customary rights and interests of Affected Populations and Organisations, as well as identifying opportunities to respect and support community livelihoods with the Industrial Economic Zone. The Entity is in close contact with surrounding communities and there have been no complaints received. Most of its employees reside in the local area.  The Entity has installed environmental protection devices to reduce the impact to the surrounding communities caused by air emissions and boundary noise.  The Entity has participated in community public welfare activities and established a plan to support the surrounding communities, available at: <a href="https://www.yuhangalloy.com/data/download/202309/01/2cb48d27f054a0defb6ca97cf04ee2b6.pdf">https://www.yuhangalloy.com/data/download/202309/01/2cb48d27f054a0defb6ca97cf04ee2b6.pdf</a>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a supply chain Policy and Conflict Minerals Control and Management Measures that address responsibilities and resources, information gathering and supplier engagement. The Conflict-Affected and High-Risk Areas (CAHRA) Policy is publicly disclosed: <a href="https://www.yuhangalloy.com/data/download/202310/11/e52256dc462f7d8d9cb7accdfd358227.pdf">https://www.yuhangalloy.com/data/download/202310/11/e52256dc462f7d8d9cb7accdfd358227.pdf</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted risk-based Due Diligence throughout their supply chain, which is imbedded in the integrated Management System and its purchasing procedures. The Entity did not demonstrate any contribution to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.  The Entity has established a CAHRA Policy, responsibilities and resources, and undertaken information gathering and supplier engagement, which publicly disclosed: <a href="https://www.yuhangalloy.com/data/download/202310/11/e52256dc462f7d8d9cb7accdfd358227.pdf">https://www.yuhangalloy.com/data/download/202310/11/e52256dc462f7d8d9cb7accdfd358227.pdf</a>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk-based Due Diligence process over its Aluminium supply chain, embedded in the integrated Management System and the purchasing procedures, did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted a risk-based Due Diligence process over their supply chain and suppliers are reviewed annually. The Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has annually reported on its supply chain Due Diligence in accordance with requirements of its CAHRA Policy and the Supplier Sustainability approach. Document review and interviews with employees and workshop supervisors did not demonstrate any contribution of the Entity to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Due Diligence Annual Report is available at: <a href="https://www.yuhangalloy.com/data/download/202310/11/390da5fd194276f9b5afa65f61fb33c9.pdf">https://www.yuhangalloy.com/data/download/202310/11/390da5fd194276f9b5afa65f61fb33c9.pdf</a>
9.9 Security practice	Conformance	The Entity has implemented a Security Services Management Procedure and has clearly defined the primary role of security guards to protect people, property and/or assets and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining -	Conformance	The Entity has established and implemented the Freedom of Association and Collective Consultation Procedure to respect the Workers' right to Freedom of Association and Collective Bargaining. The Labour Union and association for Workers at the Entity has been

CRITERION	RATING	COMMENT
Alternative means in context of Applicable Law		established in accordance with legal requirements, and acts on behalf of Workers' regarding, for example, labour remuneration, working hours, rest and vacation entitlements, occupational safety and health, vocational training, insurance and welfare. Although there are no Collective Bargaining Agreements in place, the Entity has implemented a Policy to respect the rights of Workers to Collective Bargaining.
10.2a Child Labour	Conformance	<p>The Entity has implemented the Prohibition of Child Labour Policy. Young Workers are under special protection by Labour Standards Law and not allowed to work in hazardous working conditions. The age of the candidate is verified by checking the identity documentation and on interview. The youngest Worker at the Entity is 22 years old.</p> <p>The Entity communicates the requirement to the Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented the Prohibition of Involuntary Labour Procedure, and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking.</p> <p>Based on Worker interviews (including Workers in on-site accommodation), management interviews and document review, employees are not required to provide any form of deposit, recruitment fee or advance at the any stage of employment. The Entity does not provide any form of loan to Workers and no term of Debt Bondage is found in the signed labour contracts between the Entity and Workers. The payslips of Workers indicate there is no illegal deduction.</p> <p>There is no restriction of Workers' freedom of movement at the site or in on-site accommodation. Workers can move freely to access basic liberties, such as restrooms and drinking water facilities at any time and can access external medical facilities if needed.</p> <p>The Entity has disclosed a Modern Slavery Statement: <a href="https://www.yuhangalloy.com/download-cat-1.html">https://www.yuhangalloy.com/download-cat-1.html</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity has implemented an Anti-Discrimination, Harassment and Abuse Procedure that addresses equal opportunities and anti-Discrimination in the hiring, salary, promotion, training, advancement opportunities or termination of Workers. The Entity provides training to Workers on the anti-Discrimination policy during onboarding and annual refresher training. Equal opportunities and non-discrimination are evidenced via Worker interviews and the results of the annual Business Conduct and Conflict assessment.
10.5 Communication and engagement	Conformance	The Entity has implemented an Employee Complaints Management Procedure. There are regular meetings between the Trade Union and senior management. A grievance and complaints hotline and email, as well as operating procedures are in place to ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented a corporate Policy to prevent Harassment in the workplace, which excludes any kind of Harassment and

CRITERION	RATING	COMMENT
		<p>Violence. Training is provided on the Policy to address the prevention of Harassment and countering Harassment and Discrimination. The Entity's Ethics and Compliance Integrity Line is available in all languages, and employees can anonymously report any case of Violence or Harassment. The Policies are available at: <a href="https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf">https://www.yuhangalloy.com/data/download/202309/01/b57015efb380d7140aaef78594d76060.pdf</a></p>
10.7a-c Remuneration	Conformance	<p>All wage payments made by the Entity are documented and promptly paid to all Workers by bank transfer on the 30<sup>th</sup> of every month. Employees receive remuneration for working Overtime, on public holidays, rest days and at night. Employees receive a monthly payslip that contains information on the wage calculation and deductions such as taxes. All employees are paid wages that are greater than the living wage as prescribed in China.</p>
10.8a-c Working Time	Conformance	<p>The Entity has implemented an attendance and working hours system. Based on attendance records and Workers interviews, the working hours are monitored and comply with Chinese Labour Law. Overtime is voluntary, and Workers can refuse any Overtime offered. The total weekly hours (including Overtime) do not exceed 60 hours, and at least one day's rest per week is guaranteed.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights through local information systems including the employee handbook, electronic boards, public bulletin boards located in every workshop, trainings, personal consultations and meetings.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has a valid ISO 45001:2018 certificate and has established formal Policies on Occupational Health and Safety (OH&amp;S), which are displayed on-site in public areas.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's Management System is certified against ISO 45001:2018. Performance indicators have been established and comparative analyses of performance with peer Businesses and leading practice is undertaken and reported in the annual Sustainability Report: <a href="https://www.yuhangalloy.com/data/download/202309/01/7456a79b94f96a49c62234b155f087e8.pdf">https://www.yuhangalloy.com/data/download/202309/01/7456a79b94f96a49c62234b155f087e8.pdf</a></p>
11.2 Employee engagement on Health and Safety	Minor Non-Conformance	<p>The Entity has a valid ISO 45001:2018 certificate and has established procedures on OH&amp;S control. For the purposes of employee engagement, the Entity has implemented mechanisms including safety committee meetings, suggestion box, congress and irregular Worker interviews. Records have been maintained since the Entity's establishment.</p> <p>However, an observation during the audit noted that some chemicals (for example, cutting fluid and alcohol) did not have relevant Material Safety Data Sheets (MSDS), and some chemicals (cleaning agents) were stored without secondary containment.</p>

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 November 2023	Initial Certification Audit – Full Certification

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