

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Kobelco Automotive Aluminum Rolled Products (China) Co.,Ltd

CERTIFICATE NUMBER
340

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
22 NOVEMBER 2023

DATE OF EXPIRY
21 NOVEMBER 2026

CERTIFIED SINCE
22 NOVEMBER 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Tianjin plant facility in Tianjin, China,
covering the production of thin
automobile aluminium alloy plate
and strip (series 5000 and 6000).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kobe Steel, Ltd.
ENTITY NAME	Kobelco Automotive Aluminum Rolled Products (China) Co.,Ltd
CERTIFICATION SCOPE	Tianjin plant facility in Tianjin, China, covering the production of thin automobile aluminium alloy plate and strip (series 5000 and 6000).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">25 – 26 September 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 November 2023
AUDIT SCOPE	<p>The Audit Scope covered the Tianjin plant operations for the production of thin automobile aluminium alloy plate and strip. The main production process include continuous annealing process, surface treatment process, slitter and slitting process.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	22 November 2023 – 21 November 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	22 May 2025
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CERTIFICATE NUMBER	340
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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

Kobelco Automotive Aluminum Rolled Products (China) Co., Ltd is owned by Kobelco Group, which is a wholly owned subsidiary of Kobe Steel. The factory is located in Tianjin, at the Xiqing Economic-Technological Development Area and focuses on the production and sale of series 5000 and 6000 thin automobile aluminium alloy plates and strips.

The main production process includes one heat treatment line, one surface treatment line, longitudinal cutting, cross-cutting equipment and supporting public auxiliary facilities, with an annual output of 100,000 tonnes of aluminium alloy automotive surface sheet.

Currently, the Entity also has one production workshop, one office building, one substation, five electrical rooms, one quality assurance room, one pharmaceutical warehouse, one compressor room, one maintenance centre, and one turning tool grinding room. In addition, there is one independent secondary circulation water treatment equipment, one wastewater treatment facility and one boiler room. The factory covers an area of over 67,000 m² and a total construction area of approximately 30,500 m².

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	High	Medium	High
RISKS	Medium	High	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard legal compliance requirements. The status of legal compliance is evaluated annually. The Entity has systems in place to maintain awareness of and to ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established a Policy and associated procedures to manage anti-Corruption. A whistle-blowing mechanism for internal and external interested parties has also been established and training is provided to those employees considered as high risk. The whistle-blowing log and complaint register confirmed that there have been no reports of Corruption cases in the previous three years.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct that addresses environmental, social and governance principles. The Code of Conduct is published on the Entity's website, available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/03.qiyelunliguifan.pdf Included in the ASI PS management manual, the Entity has a mechanism to review the Code of Conduct periodically or when there is any change to the Business that may alter Material environmental, social and governance risk(s) or when a non-conformance related to the Code of Conduct has been identified.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Policies for environmental, social, and governance have been approved by senior management. Senior management demonstrates commitment to the implemented Policies, and support through the provision of resources. The Policies are reviewed in the annual management review meeting. An overview is also included in the ASI PS management manual, and when there is a major Business change or control gap, the Policies shall be reviewed. The Policies are disclosed at: Policy on Human Rights: https://www.kobelco.co.jp/chinese/about_kobelco/csr/files/policy_cn.pdf https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/r-2023niandu-anquanweishengfangzhenzhong.pdf https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/s-2023niandu-huanjingnengyuanfangzhenzhong.pdf
2.2a-c Leadership	Conformance	A Senior Management Representative has been nominated. The responsibility and authorities to establish, implement, maintain and continually improve the ASI Management System are clearly defined.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established, implemented, maintains and continually improves their ISO14001:2015 certified Environment Management System. One minor non-conformance was raised in the latest audit and the audit firm approved the corrective actions.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established, implemented and maintains a Social Management System according to both the ASI Performance Standard and ISO 45001:2018 standard. The social management risk and impacts were identified and assessed, and relevant management procedures were established and implemented. The Entity holds a valid ISO 45001:2018 certificate.
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 an annual basis on responsible sourcing requirements. The Responsible Purchasing Policies are disclosed at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/c-CSRcaigoujibenfangzhen%EF%BC%88KARP%EF%BC%8920230710.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities. However, 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. The summary information regarding the Environmental and Social Impact Assessment (EIA) Summary is publicly available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/h-tiaokuan2.5-huanjingheshehuiyingxiangpingjia.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criteria is Not Applicable, as there are no New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates. The Entity has developed and implemented Emergency Response Plans, conducts annual emergency response drills to assess the effectiveness of the plans and provides emergency response training to employees. The Entity commits to conducting a reassessment of the emergency management plans in the event of any changes within the organisation that result in a modification of the nature and scale of emergency risk. Additionally, the emergency management plans will be reviewed when signs of control deficiencies arise. The Entity's emergency response plans are publicly available at: https://www.kobelco-aluminum.com/xinxigongkai/index.html
2.8a-d Suspended Operations	Conformance	The Entity has identified scenarios where it may have to suspend or significantly alter operations due to factors outside its control and considering their impact on the environment, society, and governance. It has assessed the risks, created a business continuity plan, and provided relevant training. The plan is approved by management. The trigger for review is included in the ASI PS management manual.
2.9a-b Mergers and Acquisitions	Conformance	As part of the Due Diligence processes for Mergers and Acquisitions, the Entity has established a procedure to review its environmental, social and governance practices including interactions with Affected Populations and Organisations regarding Material environmental,

CRITERION	RATING	COMMENT
		social and governance impacts. There are no mergers or acquisitions currently planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review environmental, social and governance practices in the planning process for closure, decommissioning, and divestment and interactions with Affected Populations and Organisations to develop monitoring activities. There are no closure, decommissioning or divestment activities currently planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Sustainability Report in 2022 is compiled and publicly disclosed by KOBELCO Group. The report includes information on the Entity (Kobelco Tianjin) and covers KOBELCO Group's governance approach to environmental, social, and economic impacts and its Material environmental, social, and economic impacts related to Principles in ASI Performance Standard. The Integrated Sustainability report is published at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/05.jituanzonghebaogaoshu2022.pdf
3.2 Non-compliance and Liabilities	Conformance	The 2022 Sustainability Report and official websites of the relevant government agencies and NGOs confirm that there are no significant fines, judgments, penalties, or non-monetary sanctions that would be raised against the Entity by the relevant government agencies.
3.3a-c Payments to Governments	Conformance	The financial audit report for 2022 by Deloitte demonstrated the payments to the Government by the Entity include taxes that are required by law. The taxes paid by region (consolidated cash flow basis) are disclosed in the Entity's 2022 ESG Data Book, page 60: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/02.esg_.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented whistleblowing, complaint and grievance channels and has demonstrated that these are effective. The hotline and email address are published to Stakeholders internally and externally. No complaints have been received. The whistle-blowing channel is available at: https://www.kobelco.co.jp/chinese/about_kobelco/group/china/kch.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its main product series. The assessment was conducted in accordance with relevant provisions of international standards such as ISO 14040 and ISO 14044. The LCA was performed using open LCA software and used relevant data from ecoinvent (v3.9). The LCA report is available on the Entity's website at: 5000 series: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/e-lvban5000xichanpinshengmingzhouqibaogao-V2.pdf 6000 series: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/f-lvban6000xichanpinshengmingzhouqibaogao-V2.pdf

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA report publicly disclosed by the Entity provides comprehensive disclosure of the LCA information for its products from cradle to gate. Furthermore, the Entity commits to providing the entire Environmental LCA Report through external communication if necessary. In the publicly disclosed LCA report, the Entity has fully disclosed relevant LCA information, including basic assumptions, system boundaries, and associated data.
4.2 Product Design	Conformance	The Entity itself does not engage in any product design activities. However, the Entity incorporates relevant sustainability goals into its production process control and raw material procurement processes to enhance the sustainability of its products, including the environmental life cycle impact of the final products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a target for the collection, recycling, and/or reuse of process scrap has been set at 100% and has been predominantly achieved to date. A scrap management procedure has been established to ensure the achievement of this objective. The Entity has implemented various technological and management measures to reduce the generation of Aluminium processing scrap in its operational processes. The Entity collects and recycles Aluminium processing scrap internally, and all scrap is then delivered to Aluminium recycling processors for re-use.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has developed a recycling material technology development plan based on the overall strategy of its parent company, KOBELCO Group, starting in 2023. The strategic goal is to partially incorporate Recycled Aluminium into its products within the next five years. The Entity has also committed to regular communication with its parent company, KOBELCO Group, to assess the progress and achievement of the recycling Aluminium utilisation strategy. The Entity ensures timely adjustments to its recycling Aluminium strategy and goals based on these evaluations. The Entity's recycling Aluminium utilisation strategy is available at: https://www.kobelco-aluminum.com/kechixufazhan/index.html However, it was identified that the Entity has not established clear and quantifiable targets in its recycling Aluminium utilisation plan up to 2025. This lack of specific targets hinders the periodic evaluation of the strategy's progress towards achieving its objectives.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's parent company, KOBELCO Group, has established a recycling Aluminium utilisation strategy. This strategy includes the recycling of Aluminium based on the guidelines for resource circulation and utilisation set by the Japan Aluminum Association. Leveraging the presence of a KOBELCO Group subsidiary in China, the Entity is gradually undertaking research and development efforts to increase the use of Recycled Aluminium. The goal is to achieve a 30% recycling rate by 2050.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has publicly disclosed its annual raw material usage, energy consumption, and corresponding Greenhouse Gases (GHG) emissions through the 'Product Carbon Footprint Report' published on its official website. The greenhouse gas emission data has undergone third-party verification, and the GHG emission data and verification

CRITERION	RATING	COMMENT
		statement are available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/a-14064xiangmuzhengshu.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.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a five-year greenhouse gas emission reduction target and implementation plan, with an estimated reduction of 14.7% by 2027 compared to the emissions generated in 2021. The Entity publicly discloses its emission reduction target, implementation plan, and performance on its website at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/b-ASI-5.3-01-jianpaigongzuoshishifangan%EF%BC%882022%EF%BC%89IAI.pdf</p> <p>Regular reviews are also conducted to assess the progress towards achieving the emission reduction target and the implementation status of the reduction plan.</p>
5.4 GHG Emissions Management	Conformance	The Entity has developed a GHG emission reduction Plan to define the management approaches to GHG emission, a focus on energy management. Through site observations, document review and interviews, it is confirmed that the Entity manages energy consumption and monitors the Management System performance to achieve the GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity annually compiles and reports its atmospheric pollutant emissions, which are publicly disclosed on the local environmental protection department's information platform at: https://111.33.173.33:10800/#/gkwz/ndpl/qyxq?id=2022-50A682EA21A14A98838F89DEFDIF12C</p> <p>The Entity has taken necessary measures to enhance the energy efficiency of its gas boilers to reduce exhaust gas emissions. Regular monitoring of atmospheric pollutant emissions is conducted to ensure Compliance with Applicable Laws and regulations. Furthermore, the Entity commits to reviewing and revising its management plan whenever any changes in the Entity may alter the primary risks associated with atmospheric pollutant emissions.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has publicly disclosed the details of its wastewater discharge, including the types of wastewater and the volume. Information regarding water pollutant emissions from the Entity is available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/g-shuiziyuanfengxianpinggubaogao.pdf</p> <p>and</p>

CRITERION	RATING	COMMENT
		<p>https://111.33.173.33:10800/#/gkwz/ndpl/qyxa?id=2022-50A682EA21A14A98838F89DEFD1FF12C</p> <p>In line with the water management objectives set by its headquarters, the Entity has formulated corresponding targets and management plans for water recycling. Details about these plans are available at:</p> <p>2022 ESG Data Book: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/02.esg_.pdf</p> <p>and</p> <p>Pollutant emissions in 2022 and emission reduction plan in 2023: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/w-suiwuranwupaifangliangjijianpaijihua2023.pdf</p> <p>The Entity has established a Wastewater Management Procedure and commits to reviewing and revising the plan whenever any changes in the company may alter the primary risks associated with water pollutant emissions, as well as when there are signs or trends indicating water pollution is becoming uncontrollable.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established a risk assessment and management procedure, which identifies and evaluates the risks of pollution leaks and seepage and develops corresponding emergency response measures and plans. The risk identification and emergency response plan is available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/j-huanjingyingjiyuan.pdf</p> <p>and</p> <p>https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/t-ASI-PSxielouweixianyuanbianshi-KARP-V2.pdf</p> <p>The Entity conducts regular inspections to identify potential hazards related to leaks and seepage and prepares a Soil and Groundwater Pollution Hazard Inspection Report. The Entity also commits to reviewing and revising the relevant emergency response and leak or seepage prevention management plans whenever any changes may alter the substantial risks associated with leaks and seepage, as well as when there are indications of control deficiencies.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>There have been Spills at the Entity in the past three years, and the reporting of Spills and Leakages is defined in the Entity's environment protection management procedure. The latest version of the management plan is available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/j-huanjingyingjiyuan.pdf and a list of Leakages/Leakages Risk Identification and Risk Assessment at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/t-ASI-PSxielouweixianyuanbianshi-KARP.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>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 both re-using and re-cycling waste. The disposal of Hazardous Waste complies with applicable legal requirements. The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Waste generated by the Entity from its activities in 2022-2023</p>

CRITERION	RATING	COMMENT
		at: https://111.33.173.33:10800/#/gkwz/ndpl/qyxa?id=2022-50A682EA21A14A98838F89DEFD1FF12C
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>In the environmental impact and water resource risk assessments, the Entity has determined and documented its water intake and usage based on the source and type of water. The Entity has assessed the risks associated with water, considering the surrounding water environment, water intake and discharge, as well as the effectiveness of existing management measures, the Entity's water resource risk is considered low, and there are no significant water-related risks within the Entity's scope of influence.</p> <p>The Entity has prepared a risk assessment report and a water balance diagram related to water including water use data by source and type, available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/g-shuiziyuanfengxianpinggubaogao-V2.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the water resource risk is considered low according to the Environmental Impact Assessment (EIA) Report and water resource risk assessment report, and there are no significant water-related risks within the Entity's scope of influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	An assessment of biodiversity and ecosystem services risks and impacts has been incorporated into the Environmental Impact Assessment Report conducted by a qualified third party, and the EIA report has been approved by the local environmental protection agency. Based on the EIA report and the results of the biodiversity risk assessment, there are no biodiversity-sensitive areas within the Entity's scope of influence. The Entity is located within an industrial zone which is managed by the local government and has an effective Environmental Management System. Therefore, the level of risk is considered low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the risks and potential impacts identified have been assessed and documented as low risk according to the EIA Report. Furthermore, no Priority Ecosystem Services were identified in this assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the risks and potential impacts are assessed and documented as low
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is Not Applicable to the Entity as no Priority Ecosystem Services are identified.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity has established a management Policy and procedures to identify and prevent the introduction of invasive species in operations and logistics activities. The Entity has assessed whether these activities would have significant adverse impacts on biodiversity and ecosystem services. Based on the results of the biodiversity assessment, the Entity's activities pose a low risk of the introduction of invasive species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	In its management manual, the Entity commits to not explore or develop New Projects or make 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	In its management manual, the Entity commits to the protection of the environment. There are no Protected Areas in 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 implemented a Policy with the commitment to respect Human Rights including gender equity and has communicated the Policy to all employees. The Entity has established and implemented a Human Rights Due Diligence process and mapped Affected Populations and Organisations. The risks to Human Rights are identified and assessed, no significant adverse human rights impacts are caused or contributed by the Entity's operation. The Human Rights Due Diligence process is reviewed in the annual management review meeting. The Policy is available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/01.CSR_.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented Policies to respect the Rights of women and a program to promote gender equity and women's empowerment through the full employment process. No complaints have been received from Women Workers. Interviewed women Workers state they know their rights and no negative feedback has been received. The Entity assesses the program on Gender Equity and Women's Empowerment, the report is disclosed in the ESG Data Book 2022, Section Society, available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/02.esg_.pdf
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.

CRITERION	RATING	COMMENT
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	Not Applicable	This Criterion is not applicable to the Entity, as there is no Cultural and Sacred Heritage in the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	This Criterion is not applicable to the Entity, as there are no New Projects and Major Changes causing resettlements. However, the Entity has established a process to review and assess the alternative options that avoid and minimise resettlement and displacements.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is located in an industrial zone, with no community located nearby. However, the Entity has established a Policy to commit to respecting the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity employs local people and no environmental accidents have occurred at the Entity that had the potential to pollute the surrounding environment.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Policy to not use conflict minerals and has established and established a Management System, which includes supply chain mapping, risk assessment, control plan, Due Diligence audits and reporting. The Entity provides training to all relevant employees, and the Policy and requirements are communicated to suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity maps its supply chain, The materials used by the Entity are predominantly sourced from a single supplier located in Korea which is currently certified to the ASI Performance Standard Certification. Therefore, the risk has been assessed as low. However, the Entity has not yet completed a risk assessment for a material supplier located in Japan.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity responds to risks as defined by following the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). Based on the risk assessment report, the Entity does not use materials from the CAHRAs and no red flags in the supply chain have been identified and the Entity maintains their relationships with all material suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's requirements on CAHRAs are incorporated within its supplier Due Diligence audits. The Entity conducts supplier Due Diligence audits for major tier 1 suppliers. The Audit reports confirm that no materials are currently sourced from within CAHRAs.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established a mechanism to disclose its performance related to ASI Performance Standard requirements including CAHRAS. However, it was identified that supplier chain Due Diligence activities were not reported publicly in 2022.
9.9 Security practice	Conformance	As defined in the contract signed between the Entity and the security company, the Entity has included a commitment to ensure security activities shall respect Human Rights and training is provided to security guards. Body searches are not permitted, and security personnel undertake their duties humanely. No complaints against security activities were received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as Freedom of Association and Collective Bargaining are restricted or limited in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has implemented a Policy to respect employee's Rights. The Entity's Management demonstrates they respect the Right to Freedom of Association and Collective Bargaining and has implemented a mechanism to ensure that all employees have the right to elect the employee representative freely. The employee representatives have the right to negotiate with management on employee concerns on labour rights and Environment, Health, and Safety (EHS) issues. Interviewed Workers confirm they know their rights of freely electing their representatives. Currently, there are no employee representatives elected however Workers can lodge complaints or concerns to union committee members and/or directly with management.
10.2a Child Labour	Conformance	There is no evidence of Child Labour or young Workers at the Entity, and the Entity has implemented a Policy prohibiting the use of Child Labour. The age of each candidate is verified.
10.3a-c Forced Labour	Conformance	The Entity has implemented a Policy for the prohibition of Forced Labour including Human Trafficking. The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Based on interviews with Workers and management, document review and site observation, Workers are hired directly by the Entity, do not pay any fees to be hired, no deposits are required, and loans are not provided to Workers. Identification documents are not withheld and with no unreasonable restriction on movement. Workers can freely terminate their employment with prior notice. The Entity discloses its 2022 Modern Slavery Statement at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/u-nulizhijirenkoufanmaishengming-KARP.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and no cases have been received to date. Recruitment advertisements, training, promotion, and termination records indicate the decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The payment records demonstrate equal pay for the same work and interviewed Workers

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		confirm they feel equal within the Entity. The Entity provides training courses to promote a culture of non-Discrimination.
10.5 Communication and engagement	Conformance	Direct and frequent communication channels with Workers and Worker representatives are established. Communication channels are disclosed to Workers who can raise their concerns regarding working conditions and the resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented a Policy on prohibiting any form of Violence and Harassment. As part of the risk management process, with Workers' participation, the Entity identifies and assesses the risks of Violence and Harassment and establishes and implements control measures to prevent it from occurring. A training course is provided to all Workers to report any cases of Violence and Harassment.</p> <p>There have been no cases of violence or harassment reported or found in the Entity in the past three years. The Policy is reviewed in an annual management review meeting, or when there has been a major Business change, or a control gap identified. The policy is available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/p-yuangongxingdongjizhunheguishouce.pdf</p>
10.7a-c Remuneration	Conformance	The Entity signs labour contracts with all employees, and the terms and conditions of the labour contract meet local labour contract law. The wage structure is clearly defined, and the basic wage is set above the legal minimum wage. The total payment meets the Workers' basic needs and Overtime work is paid following the legal requirements. The wage payment is always on time without delay.
10.8a-c Working Time	Conformance	Working hours are recorded by a finger-scanning meter. The regular working hours are 40 hours a day, five days a week. Working hours are monitored and controlled, the monthly Overtime working hours do not exceed the legal monthly limit, and at least one day off a week is guaranteed. Paid leave as required by the Applicable Law and regulations is provided to eligible Workers.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their Rights through orientation training, providing an Employee Handbook, and billboards on-site.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented and maintains an Occupational Health and Safety Management System (OHSMS) that is continually improved. It is worth noting that all sites under the Entity's control hold valid ISO 45001:2018 certificates, demonstrating their commitment to Occupational Health and Safety (OH&S). Through on-site observations, document reviews, and interviews with management and Workers, it has been determined that the OHSMS is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity conducts periodic reviews of its OHSMS through mechanisms such as monthly safety meetings, an annual evaluation of legal compliance, an annual internal audit based on ISO 45001:2018, and management review meetings. Should any indication of a control

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		gap arise during these reviews, a thorough assessment is conducted to determine the necessity of implementing potential corrective and/or preventive actions. This proactive approach ensures that any identified issues or gaps in the OH&S Management System are promptly addressed. To promote transparency and share performance information, the achievement of OH&S objectives and targets for the year 2022, as well as comparative analyses of performance with peer businesses and leading practices, are published. These publications are available at: https://www.kobelco-aluminum.com/wp-content/uploads/2023/07/v-ISO45001guanlitixichengxiaovi-2022nian.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a system for Worker consultation and participation in Occupational Health and Safety (OH&S) matters. The Entity encourages Workers to report issues of concern or provide suggestions regarding OH&S, either individually or through Worker representatives. Additionally, these OH&S issues, along with the corresponding actions or improvement measures, are discussed during the annual employee representative meeting, generating further suggestions for improvement.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 November 2023	Initial Certification Audit – Full Certification