

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS ALUMINUM (ZHENJIANG) CO., LTD.

CERTIFICATE
NUMBER

220

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

30 AUGUST 2022

DATE OF EXPIRY

29 AUGUST 2025

CERTIFIED SINCE

30 AUGUST 2022

AUTHORISED BY

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

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

All activities on the Zhenjiang (China) site to produce aluminium products including:

- Cast Houses
- Scalper
- 160" Hot Rolling Mill
- Horizontal Heat-treatment furnace
- Stretcher (up to 6,000 tonnes)
- Plate sawing Centre
- Ultrasonic testing
- Machining Centre
- R&D Centre & Testing Laboratory.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Aluminum (Zhenjiang) Co., Ltd.
CERTIFICATION SCOPE	All activities on the Zhenjiang (China) site to produce aluminium products including: <ul style="list-style-type: none">• Cast Houses• Scalper• 160" Hot Rolling Mill• Horizontal Heat-treatment furnace• Stretcher (up to 6,000 tonnes)• Plate sawing Centre• Ultrasonic testing• Machining Centre• R&D Centre & Testing Laboratory.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (4 – 6 July 2022)• Surveillance Audit (6 – 8 December 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	4 – 6 July 2022 (Initial Certification Audit) 6 – 8 December 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	20 July 2022 (Initial Certification Audit) 21 December 2023 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (4 – 6 July 2022)</u> The audit scope includes all activities on the Zhenjiang site to produce aluminium products. The supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

Surveillance Audit (6 – 8 December 2023)

The audit scope includes all activities on the Zhenjiang site to produce aluminium products.

The supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

30 August 2022 – 29 August 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

29 August 2025

CERTIFICATE
NUMBER

220

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The Entity has implemented systems to maintain awareness of, and to ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption such as the Management Procedure of Anti-Corruption are implemented, and personnel are trained in these processes as verified through training records. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity also has a Whistleblower Policy: https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is available on the website: https://zh-hans.novelis.com/wp-content/uploads/2023/07/%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E5%85%AC%E5%8F%B8%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99-%E4%B8%8D%E9%9C%80%E8%A6%81%E5%BE%AE%E4%BF%A1%E6%8A%AB%E9%9C%B2%E6%9B%B4%E6%96%B0.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented management Policies that are consistent with the environmental, social, and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrates a commitment to the implementation of relevant Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's Policies are accessible for both internal and external Stakeholders via training, on-site

CRITERION	RATING	COMMENT
		displays and on the Entity's website: https://zh-hans.novelis.com/wp-content/uploads/2023/07/%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E5%85%AC%E5%8F%B8%E7%8E%AF%E5%A2%83%E3%80%81%E5%81%A5%E5%BA%B7%E3%80%81%E5%A%E89%E5%85%A8%E5%92%8C%E8%B4%A8%E9%87%8F%E6%96%B9%E9%92%88_CN.pdf
2.2 Leadership	Conformance	A senior Management Representative has been nominated.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System and holds a valid ISO 14001: 2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed. The associated management provisions for preventing and/or mitigating these impacts are also established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to responsible sourcing requirements. The Entity conducts second-party Due Diligence audits at the sites of major next tier suppliers to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. The purchasing Policies are integral to the Entity's Policy for Labour and Business Ethics, accessible at: https://zh-hans.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-CHS-A4-04292021.pdf
2.5 Impact Assessments	Conformance	The Entity has developed a process to conduct environmental, social, cultural and Human Rights Impact Assessments, including gender analysis for New Projects or Major Changes to existing facilities. No such case occurred in 2022 and 2023.
2.6 Emergency Response Plan	Conformance	The Entity holds a valid ISO 14001:2015 certification and Jiangsu Province safety production standardisation (Level 2). The Entity has established Emergency Response Plans which were developed in collaboration with potentially affected Stakeholder groups such as Communities, Workers and their representatives, and relevant

CRITERION	RATING	COMMENT
		agencies. The Emergency Response Plans on social, OH&S and environmental accidents are implemented and personnel are trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for Mergers and Acquisitions, however no such activity has occurred since 2020.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment has been established by the Entity, however no such activity has occurred since 2020.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is included as part of the Novelis Group's sustainability reporting. The annual Sustainability Report for the Novelis Group in 2022 is published at: https://zh-hans.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There have been no significant fines or penalties imposed on the Entity, as reported in 2022 Sustainability Report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes or have made on its behalf, payments to governments on a legal and/or contractual basis. The Entity's financial audit reports are verified by an external Third Party accounting firm.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Internal and external whistleblowing/complaint/grievance mechanisms have been implemented and include whistle-blower hotlines and a suggestion box. These are accessible at: https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	An environmental Life Cycle Assessment (LCA) report based on ISO 14040 and ISO 14044 has been prepared by a Third Party. The assessment includes all Products and production lines, covering seven environmental impacts. However, the Entity is unable to demonstrate adequate cradle-to-gate Life Cycle Assessment (LCA) information.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) report provides cradle-to gate information on its Aluminium Products. The assessment report covers all Product processes and production lines. The LCA report is available at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/03.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA report is published on the Novelis' website and is made accessible to external Stakeholders. The Entity also provides the LCA report to external parties upon request: https://zh-hans.novelis.com/wp-content/uploads/2023/11/03.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end Products.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection and recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates the Aluminium alloys by grades for recycling. The target for Process Scrap utilisation is 100%.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is implementing a Recycling Alloy Development campaign, which aims to collect post customer Scrap from automotive manufacturers. The campaign is currently at the feasibility analysis stage.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	In the absence of complete local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity is working with automotive manufacturers on opportunities to collect and recycle scraps at the End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	In accordance with the requirements of ISO14064-1, Scope 1, 2 and 3 Greenhouse Gas (GHG) Emissions and energy use by source are tracked, calculated and documented annually. The GHG emission report in 2022 was verified by a Third Party, and the verification certificate is issued and disclosed at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/01.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8ISO14064%E8%AF%81%E4%B9%A6%EF%BC%88GHG%E6%8A%A5%E5%91%8A%EF%BC%89.pdf However, the detailed GHG Emission inventory report is not publicly disclosed.
5.2 GHG emissions reductions	Minor Non-Conformance	The Novelis Group has established a global Carbon Footprint Strategy to 2050. In alignment with this strategy, the Entity has also established local GHG Emission reduction targets and associated management programs. Further information is available at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/02.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88.pdf However, the Entity's emissions reduction plan lacks adequate details and concrete actions to cover all the material sources of GHG Emissions.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Waste air generated by the Entity is collected and treated before discharge and meets the local discharge limit. In compliance with the operational control requirements of ISO 14001, the air emission management plan with actions/controls is implemented to mitigate adverse impacts. Emissions to Air are monitored and monitoring reports indicate that emissions meet legal emission limits.
6.2 Discharges to Water	Conformance	Discharges to Water are managed within the Environmental Management System which is in conformance to the requirements of ISO 14001:2015. The wastewater generated by the Entity is collected, treated and discharged into the Municipal Drainage System for further treatment. Wastewater is monitored and the major pollutants meet local legal discharge limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	In compliance with ISO 14001:2015 requirements, an assessment of areas of operations where Spills and Leakage may contaminate air, water and soil is undertaken via a risk assessment process.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	In compliance with ISO 14001 and relevant legal requirements and based on the results of the Spills and Leakage risk assessment, the Entity has established control measures in the daily operation procedures and the Emergency Response Plan for environmental accidents associated with Spills and Leakage. Relevant personnel are provided with training.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of Spills and Leakage, both internally and externally, is defined in the Emergency Response Plan. The incident hazard reporting and investigation procedure, known to the relevant individuals. There have been no Spills or Leakage events in the past three years.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The Novelis Social Responsibility Manual requires the Entity to disclose the amount, nature and potential impact of significant Spills to all relevant interested parties. In the public Annual Report, the

CRITERION	RATING	COMMENT
		<p>impact assessment and any remedial measures disclosed.</p> <p>The have been no Spills or Leakage in the past three years. The environmental performance for 2022 has been published at: http://ywxt.sthjt.jiangsu.gov.cn:18181/spsarchive-webapp/web/viewRunner.html?viewId=http://ywxt.sthjt.jiangsu.gov.cn:18181/spsarchive-webapp/web/sps/views/yfpl/views/home/index.js</p> <p>However, the webpage of Jiangsu Provincial environmental-related information platform is perceived as inadequate, and the Entity needs to streamline the communication and disclosure process.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>Waste management is addressed by the Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is undertaken in Compliance with legal requirements.</p>
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	<p>The Entity has publicly disclosed waste generation and disposal information at: http://ywxt.sthjt.jiangsu.gov.cn:18181/spsarchive-webapp/web/viewRunner.html?viewId=http://ywxt.sthjt.jiangsu.gov.cn:18181/spsarchive-webapp/web/sps/views/yfpl/views/home/index.js</p> <p>However, the provided webpage of Jiangsu Provincial environmental-related info disclosure platform is perceived as inadequate, and the Entity needs to streamline the communication and disclosure process.</p>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross is classified as a hazardous waste in China and is collected and transferred to suppliers licensed by the environment protection bureaus. The Entity collects 100% of the Dross and stores it temporarily prior to its transfer.
6.8b Dross (recycling)	Conformance	Dross is classified as a hazardous waste in China and is collected and transferred to suppliers licensed by the environment protection bureaus. The Entity collects 100% of the Dross and transfers it to suppliers for treatment, including recycling.
6.8c Dross (review of alternatives)	Conformance	According to the supplier survey reports, the disposal suppliers extract Aluminium from Dross, and the remaining parts are utilised as construction material, with no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water is sourced from the municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into Municipal Drainage System has been provided to the Entity by the government agency for sanitary wastewater. The water consumption and discharge amounts are reported and analysed annually.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment via the approved Environmental Impact Assessment (EIA) report and pollutant discharge permit, in which the water discharge has been identified and assessed. The Entity's operational, internal and external water-related risks in its Area of Influence have been considered. Due to the nature of the Product and production processes, as well as the external water environment, the level of water-related risk is low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed information on water-related risks in the Water-Related Risks Assessment Report at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/07.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8-%E6%B0%B4%E8%B5%84%E6%BA%90%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf and the Water Balance Sheet at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/08.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B0%B4%E5%B9%B3%E8%A1%A1%E5%9B%BE.png
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is addressed in the Environmental Management System. The Entity has conducted an assessment of risks and impacts from its own operations within its Area of Influence on Biodiversity. The risk has been assessed as low. The Biodiversity Risk Assessment Report is available at: https://zh-hans.novelis.com/wp-content/uploads/2023/11/09.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8-%E7%94%9F%E7%89%A9%E5%A4%9A%E6%A0%B7%E6%80%A7%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there are no significant Biodiversity impacts identified.
8.3 Alien Species	Conformance	The main carrier medium (wooden pallets) is processed and handled in a way to avoid the introduction of Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has implemented a Policy commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respecting Human Rights and a Due Diligence process is established, which includes regular review of the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to Stakeholders. A remediation process for any adverse Human Rights impacts has been established. There have been no major Human Rights impacts reported.
9.2 Women’s Rights	Conformance	The Entity has implemented measures to ensure women’s legal rights and interests are respected. The Equal Employment Opportunity Policy has been implemented and is communicated to all employees. There has been no complaint received from women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity’s Area of Influence.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented a procedure to identify the cultural and religious sites and has conducted a risk assessment to reduce the impact on cultural and religious sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on resettlement, however no resettlement has been caused by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a procedure on resettlement, however no resettlement has been caused by the Entity.
9.7a Local Communities (rights and interests)	Conformance	Control measures for the identified impact on Local Communities are established and implemented. There have been no complaints received from the Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has implemented steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. Control measures for the identified impact on Local Communities have been established and implemented.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs Workers from the Local Communities, contributing to livelihoods through employment opportunities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has made a commitment to not using conflict minerals and communicates this through the Aluminium value chain. There are no conflict minerals used by the Entity during production.
9.9 Security practice	Conformance	Security services are outsourced, and the security contractor complies with the Entity's Supplier Code of Conduct. Body searches, including restriction of free movement, are not permitted. There has been no grievance or complaint against security activities received.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The right to Freedom of Association is addressed in accordance with Chinese Applicable Law. The Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining. The Entity commits itself to respecting

CRITERION	RATING	COMMENT
		the Workers' rights. There are nine elected union representatives including four women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The right to Collective Bargaining is addressed in accordance with Chinese Applicable Law. The Entity has a Policy of respecting rights to Freedom of Association and Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Union representatives are available to engage with management on behalf of the Workers on any issues of concern.
10.2a Child Labour (minimum age)	Conformance	Child Labour (under 16 years) is prohibited in China. There is no Child Labour or young Workers (16 to 18 years) in the Entity. The youngest worker at the Entity is 20 years old.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself, and expects its suppliers, to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. Workers are not required to provide any form of deposit, Recruitment Fees or equipment in advance.
10.3c Forced Labour (migrant workers)	Conformance	The Entity commits that it shall not require Migrant Workers to lodge deposits or security payments at any time. There are no foreign Migrant Workers in the Entity.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans to Workers or hold Workers in debt bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour and there is no restriction of Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour and does not retain Workers original documents. Only copies of original documents are kept in Workers' personnel files.

CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of employment is in compliance to Labour Contract Law.
10.4 Non-Discrimination	Conformance	The Entity has implemented Policies and procedures that effectively ensure equal opportunities and the Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	Regular meetings between union representatives and senior management are conducted. The grievance and complaints hotline has been announced. These mechanisms, as well as the Entity's operating procedures ensure open communication and direct engagement with Workers and their representatives regarding working conditions, resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are not related to inhumane actions, harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation. The Entity's discipline procedure has been implemented.
10.7a Remuneration (living wage)	Conformance	The Entity's wage structure is clearly defined, and the basic wage is above the local legal minimum wage. The compensation for Overtime meets legal requirements. Mandatory allowances are provided to Workers, and all employees are enrolled in the mandatory social insurance and housing fund scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid in a timely manner to all Workers via bank transfers before the 28 th of the following month.
10.8 Working Time	Conformance	The working hours are recorded by an IC cards system. The Entity controls the working hours, and both regular working hours and Overtime working hours meet the applicable legal requirements. One rest day in every seven days is guaranteed to Workers.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An Occupational Health and Safety (OH&S) Policy has been established, implemented, reviewed periodically, and communicated with Stakeholders.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The (OH&S) Policy is applied to Workers and Visitors in Compliance with the legal requirements.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The (OH&S) Policy includes a commitment to comply with the legal requirements and other standards. Systems exist to identify all applicable legal requirements and other standards and evaluate the legal Compliance quarterly.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	In Compliance with legal requirements, Workers are provided with training to understand the hazards, OH&S risks and the control measures that are aimed to protect them, and the right to refuse unsafe work without negative consequences.
11.2 OH&S Management System	Conformance	The Entity has established, implemented, maintained and continually improved the documented Occupational Health and Safety (OH&S) Management System. The Entity currently holds a Work Safety Standardization Level Two certificate. The Entity possesses all licenses, permits and test records as legally required. Operational controls for identified OH&S hazards are implemented effectively.
11.3 Employee engagement on health and safety	Conformance	The Entity has several mechanisms by which the Workers can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management. Workers are encouraged to report their concerns or advice on OH&S issues or via the Worker representative to management.
11.4 OH&S performance	Minor Non-Conformance	Occupational Health and Safety targets and improvements have been established and documented in the Occupational Health and Safety (OH&S) Program. Implementation plans have been established and implemented. The status of performance against targets is monitored periodically and reported to relevant management for further action as required. However, the Entity does not currently undertake any comparative analyses of OH&S performance with peer Businesses.

Document Control and Version History

Revision	Date	Notes
0	30 August 2022	Initial Certification Audit - Full Certification.
1	20 February 2024	Surveillance Audit