
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**LIZHONG SITONG
LIGHT ALLOYS
GROUP CO., LTD.**

CERTIFICATE
NUMBER

166

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

10 DECEMBER 2021

DATE OF EXPIRY

9 DECEMBER 2024

CERTIFIED SINCE

10 DECEMBER 2021

AUTHORISED BY

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

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

Design and manufacture of Aluminium based master alloy, Copper based master alloy, special alloy, metal additives and fluxes in the Lizhong Sitong Light Alloys Group facility in Baoding City, Hebei Province, China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lizhong Sitong Light Alloys Group Co., Ltd.
ENTITY NAME	Lizhong Sitong Light Alloys Group Co., Ltd.
CERTIFICATION SCOPE	Design and manufacture of Aluminium based master alloy, Copper based master alloy, special alloy, metal additives and fluxes in the Lizhong Sitong Light Alloys Group facility in Baoding City, Hebei Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial 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 (10 – 11 June 2019)Surveillance Audit (29 – 30 May 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">9 - 10 September 2021 (Initial Certification Audit)29 – 30 May 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 November 2021 (Initial Certification Audit)2 August 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 11 June 2019)</u></p> <p>The audit scope covers Lizhong Sitong Light Alloys Group Co., Ltd. (China), including the design and manufacture of Aluminium based master alloy, Copper based master alloy, special alloy, metal additives and fluxes.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (29 - 30 May 2023)

The audit scope covers Lizhong Sitong Light Alloys Group Co., Ltd. (China), including the design and manufacture of Aluminium based master alloy, Copper based master alloy, special alloy, metal additives and fluxes.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/ Refining
- Casthouses
- 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

10 December 2021 – 9 December 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

9 December 2024

CERTIFICATE
NUMBER

166

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to collect the applicable legal law/regulation. The Legal, EHS and Management Departments are responsible for the collection and assessment, at least quarterly, of the Applicable Law covering labour, ethics, health and safety and the environment. A qualified third party is engaged by the Entity to assess and control the legal law/regulation risks.
1.2 Anti-Corruption	Conformance	A business ethics policy/procedure has been established, which addresses Extortion and Bribery, and training is provided for employees. The ethics reporting channel is included in the Sustainability Report, available at: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf The Entity undertook a Due Diligence investigation to determine the high-risk departments, which include Purchasing, Sales, Quality and Warehouse. All staff in these departments have signed an Honesty Commitment Letter.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct that is consistent with the ASI Performance Standard. Workers are provided with regular training. The Entity has communicated the Code of Conduct to their suppliers who have subsequently signed a Commitment Letter. The Code of Conduct is included in the Sustainability Report, available at: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an ASI Policy on environmental, social and governance compliance, which is included in Sustainability Report, available at: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented an ASI Policy that has been endorsed by the senior management team. The effectiveness of the Entity's ASI Management

CRITERION	RATING	COMMENT
		System is reviewed during the annual management reviews.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The ASI Policy is available for internal and external Stakeholders through training, posts on-site and the Entity's website: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
2.2 Leadership	Conformance	The Entity's Quality Department Manager has been appointed as the Management Representative to ensure that the social, environmental and governance requirements of the ASI Performance Standard are reflected in the Entity. The authority and responsibilities of this role are defined in the appointment letter. An ASI Team has also been established to support the implementation of the Entity's ASI Management System.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System, that is certified against ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an ASI Management System, which includes the Social Management System. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4 Responsible Sourcing	Conformance	The Entity is committed to responsible sourcing, which is implemented through supplier assessments, supplier-signed Commitment Letters, and emphasizing to suppliers the implementation of the ASI Performance Standard. The Responsible Sourcing Policy is available at: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf Due Diligence investigation reports and supplier audit reports are maintained were provided for review.
2.5 Impact Assessments	Conformance	The Entity has regularly conducted Impact Assessments regarding environment, health and safety, social responsibilities and communities. Further Impact Assessments will be undertaken for future New Projects or Major Changes at the Entity.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected Stakeholder groups, the Emergency Response Plans have been established and implemented. Training is provided periodically.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a merger or acquisition control procedure, including a Due Diligence process. In the past three years, no merger or acquisition activity has occurred at the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a closure, decommissioning and divestment control procedure. No such activity has occurred since the ASI Management System commenced operation or in the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its Sustainability Report, available at: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity provides information on non-compliance and liabilities with failure to comply with Applicable Law. Non-compliance issues are made public on the government website, available at: https://www.gsxt.gov.cn/%7BA4CA302B9522165D52494FF8F7289D233800212E99A17EBF45F24C576F889D8680B867A65CEBCA814AF4BF74555372C5FCB2208A454BED6866F479FCF2E2CE8222FC22FC226ECE10E739E739E739E7ABE75FE76BB5F0B13DE33DE3AF58034BFE192BF2FD22970402BCB3DA96D79BDAA988C3082911A4ABC28E508E508E50-1687179425784%7D The Entity also discloses issues in its Sustainability Report, available at: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf There were no fines or other non-compliance issues in the past three years.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has disclosed its payments to governments in the 2022 Financial Audit Report: http://www.cninfo.com.cn/new/disclosure/detail?or_gld=9900023052&announcementId=1216556763&announcementTime=2023-04-25 The only payments to government are those legally required, and there is no other payment.

CRITERION	RATING	COMMENT
		The Entity has also disclosed payments to governments in its Sustainability Report: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented an ASI Management System, which tracks requests and complaints from Stakeholders and has an appropriate Complaints Resolution Mechanism. The communication channels (telephone/email) are public to internal and external Stakeholders, which are included in the Sustainability Report: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	An environmental Life Cycle Assessment (LCA) has been conducted and documented for all Products. However, the LCA report only focuses on the carbon footprint, and does not include impacts related to water, hazardous substances, air pollutants, and other impacts.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products covering all production processes and the main supporting activities, such as melting, energy, transportation, recycling and waste disposition. The LCA report is provided upon requested.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA is included in the Entity's Sustainability Report, available at: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf The Entity has established an LCA management of information procedure, which defines the process to communicate with customers on the LCA.
4.2 Product design	Conformance	The Entity has integrated relevant objectives for the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the Products.

CRITERION	RATING	COMMENT
		The target for these relevant aspects is defined annually and monitored monthly.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established a waste/scrap management procedure with targets 100% recycling of Process Scrap. The Entity collects all Process Scrap generated in its operations, recycles it in the melting process and records the amount daily. Site observations confirm that this procedure is well implemented. Information on Process Scrap is available in the Sustainability Report: http://www.stnm.com.cn/uploads/tiny/mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Product component control is one of the requirements of the Quality Management System. Process Scrap is identified with a unique batch number for traceability and alloy separation. The management interview and site observations indicated that the Entity has implemented its procedure for the separation of Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Due to the absence of local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity does not collect and recycle the Products at End of Life. The Entity has informed its clients about the possibility to influence the recycling rate through Product design and additional information on the Product.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Due to the absence of local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity does not collect and recycle the Products at End of Life. The Entity has a formal Policy and procedures for internal recycling and has a clear target for the rate of Recycled Aluminium in its final Products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has implemented its management procedure for the calculation of GHG emissions, and the major Scope 1 and 2 GHG emissions and energy use by source are tracked, calculated and documented annually. The energy consumption is monitored and documented as one of main GHG emission sources, as well as other major emission sources. The energy consumption and other major GHG emissions sources are converted into GHG

CRITERION	RATING	COMMENT
		emissions using the GHG protocol defined by the Entity. The Entity discloses its GHG emissions in the Sustainability Report: http://www.stnm.com.cn/uploads/tiny_mce/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has established a GHG emissions reduction target and an implementation plan to reduce its GHG emissions per tonne from 2021 to 2022 by 0.5%. However, the Entity has not established medium and long-term GHG emissions reduction targets and measures, including adoption of new technologies or resources.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity's air emissions are quantified in the EIA report. Treatment devices are used to reduce emissions. The Entity has monitored its Emissions to Air quarterly, which meet the local legal limit.
6.2 Discharges to Water	Conformance	The Entity has established a wastewater inventory to control the Discharges to Water. Industrial wastewater is collected as Hazardous Waste and transferred by a qualified third party. Domestic wastewater is discharged to the local municipal system after pre-treatment in the internal wastewater plant. A qualified third party monitors final wastewater outlets annually. There was no punishment by the local bureau or negative disclosure by any other party identified during the audit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	A qualified third party has assessed the Spills and Leakage at the Entity and established Emergency Response Plans (ERP). The plans have been approved by the local bureau. The assessment reports cover all the potential risks.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	A qualified third party has assessed the Spills and Leakage at the Entity and established ERPs. The Plans have been approved by the local bureau. Annual emergency drills are included in the ERP. During the site observation, adequate and effective control measures were implemented for all the potential risks.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills and Leakages is defined in the management of information disclosure procedure. There has been no Spill since the Entity commenced operations. The information is published in the Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
6.4b Reporting of Spills (regular reporting)	Conformance	An impact assessment of the any Spills and the associated remediation actions are published in the Entity's annual Sustainability Report. There has been no Spills since the Entity commenced operations. The information is published in the Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
6.5a Waste management and reporting (strategy)	Conformance	Waste management is addressed in the Entity's Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is compliant with the legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses its Waste generation and disposal information in the Sustainability Report, available at: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Part of the Dross is recycled in the melting process. The remaining Dross is sold to an external company for recycling, which can be used to produce Aluminium alloying ingots or other utilities, such as construction materials.
6.8b Dross (recycling)	Conformance	Part of the Dross is recycled in the melting process. The remaining Dross is sold to an external company for recycling, which can be used to produce Aluminium alloying ingots or other utilities, such as construction materials.
6.8c Dross (review of alternatives)	Conformance	Dross residue is recycled by an external company. The Entity conducts an annual onsite audit on the disposal of Dross, to ensure there is no landfilling of Dross residue.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has conducted a water-related risk analysis including water balance to identify and map its water withdrawal and use by source and type. The water source is municipal water and consumption is not significant due to the nature of the Product and the production processes. The water balance map is published in the Sustainability Report: http://www.stnm.com.cn/uploads/tinyMCE/images/f

CRITERION	RATING	COMMENT
		adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment, which considered the Entity's operational, internal and external risks in its Area of Influence. Due to the nature of the Product, production processes and the amount of municipal water withdrawal, as well implementation of the Entity's water management system, the level of water-related risk is low. The risk assessment is published in the Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity as, there are 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 to the Entity as, there are no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	Water usage and risks are published in the risk assessment report, included in the Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a Biodiversity assessment as part of the EIA, prepared as a legal requirement. The risk and impacts on Biodiversity from the Entity's operations in the Entity's Area of Influence was assessed as low. The assessment involved qualified third parties and the report was approved by the local Environmental Protection Bureau. Further information is included in the Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/adde0419be70e253ec632f54392f6a5648c18df135b9.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity risk assessment did not identify significant Biodiversity impacts.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity risk assessment did not identify significant Biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Biodiversity risk assessment did not identify significant Biodiversity impacts. Further information on the Biodiversity assessment is published in the Sustainability Report: http://www.stnm.com.cn/uploads/tinyMCE/images/fadde0419be70e253ec632f54392f6a5648c18df135b9.pdf
8.3 Alien Species	Conformance	The outcome of the Biodiversity risk assessment did not identify significant Biodiversity risk or impacts associated with 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 operations)	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 established a Policy and procedure with commitment to respecting Human Rights in its ASI Management Manual. The Entity has identified the risk of impacting on Human Rights and provides training for all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a procedure to conduct a Human Rights Due Diligence. The Human Rights Due Diligence considered the Entity, its suppliers and communities, and relevant reports were provided for review.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established a complaints/grievance channel for Stakeholders. However, no adverse impacts have been reported and no remediation has been required.
9.2 Women’s Rights	Conformance	Women’s rights and interests are respected. The Entity has identified the legal rights for women and

CRITERION	RATING	COMMENT
		implemented control measures to ensure these are met, such as providing sufficient protection to pregnant Workers and nursing mothers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the area where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the area where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	As confirmed in the Environmental Impact Assessment, there is no cultural or sacred heritage sites or values is affected by the Entity.
9.6a Resettlements (avoid or minimise)	Conformance	As confirmed in the Environmental Impact Assessment, there is no cultural or sacred heritage sites or values is affected by the Entity.
9.6b Resettlements (where unavoidable)	Conformance	As confirmed in the Environmental Impact Assessment, no Resettlement has been necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an ASI Management Manual, which includes commitment to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity is in industrial park, with the nearest Communities approximately 1.5 kilometres away. The majority of the Entity's employees are from the local area. The Entity has installed environmental protection devices, such as air emission treatment facilities, to reduce the impact of air emissions and boundary noise on the surrounding Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs approximately 95% of its Works from the Local Communities. The Entity has established plans to support the surrounding Communities, and has provided job opportunities to disable workers, made donations to the Local Communities, and a Social Assistance Foundation has been established.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established an ASI Management Manual, which includes the commitment to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). Through internal investigation and Due

CRITERION	RATING	COMMENT
		Diligence investigation reports, as well as the supplier signed commitments, it is evident that no material comes from CAHRAs.
9.9 Security practice	Conformance	Security at the Entity is provided by the parent company. The Entity has established an ASI Manual and Security Code of Conduct to respect Human Rights. All security staff are trained on the Human Rights Policy and procedure, which addresses Harassment, abuse and Forced Labour. All the security practices respect Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the Workers' Rights. There are nine elected Worker representatives and an Association for Workers has been established.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Collective Bargaining in China. However, the Entity respects the rights of Workers to participate in any Collective Bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Workers' representatives can deal with the Workers' concerns with management on behalf of Workers.
10.2a Child Labour (minimum age)	Conformance	As evidenced by the review of the roster, personnel files and Worker interviews, the Entity does not use Child Labour (below 16 years) or young Workers (16 to 18 years).
10.2b Child Labour (hazardous)	Conformance	As evidenced by the review of the roster, personnel files and Worker interviews, the Entity does not use Child Labour (below 16 years) or young Workers (16 to 18 years). If young Workers were to be used, they are under special protection and not allowed to work in Hazardous working environments.
10.2c Child Labour (worst forms)	Conformance	As evidenced by the review of the roster, personnel files and workers interviews, the Entity does not use Child Labour (under 16 years old) or young Workers (16 to 18 years). If young Workers were required, they are under special protection and are not allowed to work in Hazardous working environments. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established an ASI Management Manual, and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Forced Labour was not found in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established an ASI Management Manual to ensure it is not involved in Forced Labour. All employees are employed directly, and no deposits, fees or advances are required from employees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established an ASI Management Manual and procedure to ensure it is not involved in Forced Labour. No foreign Migrant Workers are used by the Entity, all Workers are Chinese, and the Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established an ASI Management Manual and procedure to ensure it is not involved in Forced Labour. No deposits or security payments are permitted.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established an ASI Management Manual and procedure to ensure it is not involved in Forced Labour. There is no restriction to the movement of Workers at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established an ASI Management Manual and procedure to ensure it is not involved in Forced Labour. The Entity does not hold original documents, passport or permits, only copies of identification in the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established an ASI Management Manual and procedure to ensure it is not involved in Forced Labour. The time for announced termination is regulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity has established a Policy/procedure on Anti-Discrimination, which includes employment, promotion and training processes. The Entity has over 120 disabled Workers, whom receive the same payment as other Workers.
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System, and direct and frequent communication with Workers and the representatives of the Worker council is

CRITERION	RATING	COMMENT
		established. Worker interviews indicated a positive working environment with direct communication.
10.6 Disciplinary practices	Conformance	The Entity has established the ASI Management Manual, which states the Entity does not tolerate any form of punishment or Harassment. It requires its suppliers to comply with its policy/procedure. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker representatives. Disciplinary records must be confirmed by Workers and management.
10.7a Remuneration (living wage)	Conformance	Wages are in compliance with the legal standard, and meets the basic needs of Workers. All the employees are enrolled in the social insurance housing fund.
10.7b Remuneration (method of payment)	Conformance	As confirmed by payroll records, wage payments are documented and paid to Workers on the 20 th of each month, directly into the employees' bank accounts in accordance with the labour contract and Applicable Law. There was no evidence of delayed payment in the past 12 months.
10.8 Working Time	Conformance	The Entity has established a procedure to provide for paid annual leave, sick leave, marriage leave, maternity leave and other leave for Workers. Working hours are recorded and monitored. The weekly working hours, monthly Overtime, and rest days are compliance with the legal requirement or industry standards.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Occupational Health and Safety (OH&S) Management System certified to ISO 45001:2018. In compliance with the management system requirements, the OH&S Policy is implemented, reviewed periodically and communicated to Stakeholders. The Policy is available in the Sustainability Report: http://www.stnm.com.cn/gsxw/n1774.html
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 and the requirements of ISO 45001:2018.
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 requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance in

CRITERION	RATING	COMMENT
		accordance with the requirements of ISO 45001:2018.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The OH&S Policy includes a commitment to prevent Workers from injury and harm in the workplace. Workers are provided with the training courses to understand the hazards, OH&S risks and the safe practices and actions relevant to their work, and all Workers are made aware of their right to refuse unsafe work without undue consequences for doing so.
11.2 OH&S Management System	Conformance	The Entity has implemented an ISO 45001:2018 certified Management System, valid to December 2025.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of Workers' consultation and participation in health and safety in accordance with the requirements of ISO 45001:2018. The Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Worker representative, and management responds to the concerns and advice.
11.4 OH&S performance	Conformance	Health and Safety targets and improvements are established and documented in the Occupational Health and Safety Program. The OH&S performance is tracked monthly to ensure full compliance.

Document Control and Version History

Revision	Date	Notes
0	10 December 2021	Initial Certification Audit - Full Certification
1	7 February 2024	Surveillance Audit