

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Suzhou Chuangtai Alloy Material Co., Ltd.

CERTIFICATE NUMBER

356

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

11 APRIL 2024

CERTIFICATION LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

10 APRIL 2027

ASI ACCREDITED  
AUDITING FIRM

SGS-CSTC STANDARDS  
TECHNICAL SERVICES

CERTIFIED SINCE

11 APRIL 2024

## AUTHORISED BY

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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](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE


The manufacture of un-forged  
Aluminium alloy billets and  
Aluminium alloy profiles including  
the melting, casting, cutting,  
homogenising, profile extruding,  
and computer numerical control  
machining at Suzhou Chuangtai  
Alloy Material Co., Ltd. , China.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	INNOVATION New Material Technology Co., Ltd.
ENTITY NAME	Suzhou Chuangtai Alloy Material Co., Ltd.
CERTIFICATION SCOPE	The manufacture of un-forged Aluminium alloy billets and Aluminium alloy profiles including the melting, casting, cutting, homogenising, profile extruding, and computer numerical control machining at Suzhou Chuangtai Alloy Material Co., Ltd., China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>11 – 14 December 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>10 January 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope includes the melting, casting, slitting, homogenising, and profile extruding are the CNC machining processes used to manufacture unforged Aluminium alloy billets and Aluminium alloy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li></ul>

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 The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION PERIOD 11 April 2024 - 10 April 2027

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 11 October 2025

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CERTIFICATE NUMBER 356

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

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

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

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## ENTITY OVERVIEW

The Entity was established in December 2014, and it is located in Suxiang Cooperation Zone, Suzhou City, Jiangsu Province. It specialises in the processing, sales, and production technology research and development of new Aluminium alloy materials, lightweight Aluminium magnesium alloy materials for transportation, and high-end products such as 3C. The Entity is a wholly owned subsidiary of Shandong Innovation Metal Technology Co., Ltd., and it covers a total area of 316 acres.

The Entity's main production processes include casting, extrusion, and machining, with a designed production capacity of 250000 tons/year for casting and 60000 tons/year for extrusion. At present, the actual production is about 22,0000 tons/year for casting and about 30000 tons/year for extrusion. They have six workshops, one office building, and two dormitory buildings. Inside the workshops, there are tilting melting furnaces, automatic casting machines, homogenising furnaces, sawing machines, peeling lines, extruders, precision saws, aging furnaces, precision machining lathes, cleaning lines, stamping machines, bending machines, and other equipment. The workshop also has semi-finished product transfer warehouses and finished product warehouses.

The factory is equipped with a reuse water treatment station, an air compression station, a hazardous waste warehouse, and a general solid waste warehouse. Parking lots and protective fences with video surveillance are set up around the factory. There are gardens and landscape ponds within the factory area to meet the leisure needs of employees, and dormitories are provided for their rest.

The Entity employs 675 people, and its main Stakeholders include shareholders, customers, partners, upstream supply chains, and government-related departments (such as the tax authorities). The Entity's continuous development provides employment opportunities for nearby residents and drives the economic development of the surrounding areas. The Entity's production activities do not have any impact on nearby communities or residents.

The Entity is committed to the concept of green development and strives to build a sustainable Aluminium industry chain that covers the entire process of Aluminium recycling, casting, extrusion, and CNC precision processing. The Entity has participated in and led the drafting and formulation of multiple non-ferrous metal standards and has been awarded the honorary titles of "Demonstration Base for Standard Development and Innovation of Aluminum and Aluminum Alloy Melting and Casting Wastewater, Exhaust Gas, and Waste Residue Control Specification", "Jiangsu Province Green Factory", "National Green Factory", "Jiangsu Province Private Science and Technology Enterprise", and "Suzhou Engineering Technology Research and Development Center".

The Entity actively promotes digital transformation and upgrading and strives to become an "Intelligent Company" by implementing intelligent manufacturing. And aims to become a pioneer of innovation groups in the Yangtze River Delta region and to establish itself as a leading domestic developer and manufacturer of responsible, low-carbon, circular, intelligent, and innovative Aluminium alloy products.

## MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	High	Low	LOW
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	High	Medium	MEDIUM
<b>OVERALL</b>	Medium			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a 'Laws and Regulations Management' Procedure which defines the responsibilities and the method, timing and frequency of identifying and evaluating Compliance with laws and regulations applicable to the environment, society and governance topics in the Compliance evaluation report. Every year the Entity must evaluate Compliance with these requirements.</p> <p>However, it was identified the Compliance evaluation procedure does not include the laws and regulations regarding social responsibility.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established the 'Program of Anti-Corruption and Anti-Foreign Bribery and Anti-Corruption Management Control' Procedure, which defines the prohibition of Bribery in all business practices and transactions.</p> <p>The Responsible Procurement Policy also addresses Anti-Corruption, available at: <a href="http://innovationmetal.com/d/file/p/2023/12-22/03ab24bc903574de8be3102225d5b931.pdf">http://innovationmetal.com/d/file/p/2023/12-22/03ab24bc903574de8be3102225d5b931.pdf</a></p> <p>The Bribery Policies and procedures are communicated to and understood by employees and others acting on behalf of the Entity. The Entity provides different anonymous reporting channels such as a whistle-blowing mailbox and call number, both available on the official Supervisory Notice Board. The Entity has demonstrated that the anti-Bribery Management System is effective.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has published the Code of Ethics and Business Conduct, available at: <a href="http://innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021aeea5e065df9e8d8be8d58.pdf">http://innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021aeea5e065df9e8d8be8d58.pdf</a></p> <p>The Responsible Business Alliance Management Manual was developed for the Entity's labour, health and safety, environment, business ethics and governance performance. The document control procedure stipulates a review of these Codes is undertaken once a year.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintained a series of Policies consistent with the environmental, social, and governance practices. The Policies have been approved by the General Manager and supported through provisions of resources. In 2020, the Entity established an Environment, Health, and Safety Management system. In 2021, they also established a Social Responsibility Management System. These Management Systems require the Policy to be reviewed annually as part of the Management Review process. Additionally, any changes to the business that could affect environmental, social, or governance risks, or any indication of a control gap require a review of the Policy. The most recent review was conducted in September 2023.</p> <p>The Policies are communicated internally through orientation, training, display slogans, etc. and interested external parties can obtain the Policies from the website, available at: <a href="http://innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cf1ec5f154.pdf">http://innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cf1ec5f154.pdf</a></p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	A Senior Management Representative has been nominated, and the responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an ISO 14001:2015 certified Environmental Management System. No fines or requests for corrective actions from government agencies or other Stakeholders.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented Social Management Systems and conformed to legal Compliance requirements. An annual Compliance evaluation is conducted, with no fines or requests for corrective actions from government agencies and other Stakeholders.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has established a Sourcing Management Procedure and a Responsible Sourcing Policy. Both the Sourcing management procedure and Responsible Sourcing Policy aim to communicate the environmental, social, and governance aspects to raw and auxiliary materials suppliers and contractors. The Entity has already communicated these Policies to all suppliers and contractors through the 'NC Sourcing System', which is the on-site Procurement Management System.</p> <p>The Entity's Responsible Sourcing Policy is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/03ab24bc903574de8be3102225d5b931.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/03ab24bc903574de8be3102225d5b931.pdf</a></p> <p>However, it was identified that no Due Diligence has been undertaken on service suppliers' activities as per the Responsible Sourcing Policy.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.</p> <p>However, the Entity has evaluated the environmental, social, cultural and Human Rights impacts as part of the Environmental Impact Assessments, as well as evaluating the effectiveness of occupational hazard controls during the Entity factory's initial construction.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.</p> <p>However, the Entity has established a Human Rights Impact Assessment process and disclosed its performance on Human Rights in its Sustainability Development Report, pages 38-40: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>The Entity's commitment to Business and Human Rights Policy is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/3e66e9915aa3f96f01e8cacc0dd636c.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/3e66e9915aa3f96f01e8cacc0dd636c.pdf</a></p>
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Response Plans to address any potential for an Aluminium powder explosion and excessive discharge of domestic sewage and emissions. All employees are trained on the emergency plan with regular drills undertaken. The Entity has submitted an emergency plan with the local Ecology and Environment Bureau and Emergency Management Centre.

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has established Management of Suspension of Operations including a business resilience plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control that consider Material adverse environmental, social and governance impacts. The Entity reviews its Business Resilience Plan every five years. The procedure includes reviewing the Business resilience plan for any indication of a control gap or after any changes to the Business that alter the nature or scale of environmental, social and governance risks. As of now, no significant changes have been made, so no reviews have been implemented.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established management control procedures for investments and acquisitions. Currently, there is no Merger or Acquisition activity proposed.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment. The last such activity occurred in 2023.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainable Development Report covers Material impact and governance approach to environmental, social and economic topics, available at: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has established the Code of Ethics and Business Conduct stipulating the public disclosure of information on an annual basis on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. Details are available in the Code of Ethics and Business Conduct, page 18: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021aace5e065df9e8dbe8d58.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021aace5e065df9e8dbe8d58.pdf</a></p> <p>The official websites of the relevant government agencies and Non-Government Organisations (NGOs) do not list any fines or non-compliance raised by the government agencies. There are no significant fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law in 2023.</p>
3.3a-c Payments to Governments	Conformance	The Entity's 'Anti-Bribery and Anti-Corruption' Procedure and financial rules state that payments to the government must be approved by the Chairperson of the Board following a financial audit. The Entity publicly disclosed their donations at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/f6f9534c2e0e3799a2421d835822bffc.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/f6f9534c2e0e3799a2421d835822bffc.pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible Complaints Resolution Mechanism, available at: <a href="https://www.innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf">https://www.innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf</a></p> <p>The mechanism is reviewed every five years and after any changes to the Business that alter Material environmental, social and governance risks or on any indication of a control gap. On-site testing of the complaint tip-off call demonstrated there were no faults. The tip-off</p>

CRITERION	RATING	COMMENT
		number and general manager email box information are available at: <a href="https://innovationmetal.com/about/memcompany/3.html">https://innovationmetal.com/about/memcompany/3.html</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established a Greenhouse Gases (GHG) Inventory Procedure and has a Life Cycle Assessment (LCA) Verification statement for one kilogram (1kg) cast Aluminium products (raw material is 50% Recycled Aluminium ingot and 50% hydro-Aluminium ingot). The statement contents include the environmental impact categories in the lifecycle from cradle to gate. The LCA Report is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/8d89b57650108ea677470c9914adf672.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/8d89b57650108ea677470c9914adf672.pdf</a>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA Report is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/8d89b57650108ea677470c9914adf672.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/8d89b57650108ea677470c9914adf672.pdf</a>  Currently, the Entity has not received any customer requests for information regarding its Aluminium-containing products' cradle-to-gate LCA.
4.2 Product Design	Conformance	The Entity has established a 'New Product Development Controlling' Procedure that requires the consideration of materials selection and utilisation during the production development and process planning process. This procedure aims to ensure appropriate process selection, improved process efficiency, equipment and load optimisation, process optimisation, extended service life, convenient maintenance and cost-saving, as well as improving Scrap management and disposal.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a goal of achieving a 100% recycling rate for process waste generated during the production of Aluminium products and regularly evaluates its progress. The Entity manages five types of Aluminium alloy grades through colour classification, with all data on the quantities available through the Numerical Control (NC) system.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	As there is a lack of a local, regional, or national collection and recycling system for Aluminium Scrap in China, the Entity's headquarters has set up a Scrap Aluminium recycling company to increase recycling rates. In addition, the Entity is collaborating with customers and suppliers to determine how to improve the recycling rate of products at end-of-life. The Entity has publicly disclosed its recycling strategy from 2022 to 2024 as well as actual quantities of reused Scrap Aluminium profiles and Aluminium Scrap: <a href="https://www.innovationmetal.com/d/file/p/2024/02-26/8090f54cb408a1db51419cdf01f83ce2.pdf">https://www.innovationmetal.com/d/file/p/2024/02-26/8090f54cb408a1db51419cdf01f83ce2.pdf</a>



CRITERION	RATING	COMMENT
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has publicly disclosed Material GHG emissions by source annually in the Sustainability Development Report, Chapter 5 Greenhouse Gas Management, page 91:  <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>There are direct and indirect (categories 1-6) emissions data in the GHG Verification Statement which is verified by an independent body. The GHG Emission Statements are available at:  <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/397d43dbe0305eabe322c77d1ccd439a.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/397d43dbe0305eabe322c77d1ccd439a.pdf</a></p>
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 'GHG Controlling and Management' Procedure, which defines the annual analysis and implementation of GHG emission reports according to the ISO14064-1:2018 standard. The Entity annually reviews its GHG reduction plan and the GHG reduction pathway, or after changes to the Business that may alter baselines or targets. The Entity plans to reduce its CO<sub>2</sub> emissions to below 1,400,000 tCO<sub>2</sub>e by 2025 according to its Energy and Resource Management Procedure. A GHG reduction pathway is included in the Plan, which also includes initiatives such as recycling the waste heat from natural gas combustion exhaust gas, installing photovoltaic power generation equipment on the roof and purchasing 'Green Electricity'.</p> <p>The Entity has publicly disclosed its GHG reduction plan and pathway in its Sustainable Development Report, Chapter 5 Greenhouse Gas Management, pages 85-91:  <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>The Entity's Greenhouse Gas Emission Reduction Content and Plan is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/973ec42c126ffd22a03c0dd231524ebb.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/973ec42c126ffd22a03c0dd231524ebb.pdf</a></p>
5.4 GHG Emissions Management	Conformance	The Entity has established an Energy Management System Manual and GHG Inventory Procedure, which defines the GHG emissions control measures and annual analysis of GHG emissions according to the ISO14064-1:2018 standard to achieve performance aligned with the GHG Emissions Reduction Plan and targets.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has publicly disclosed its exhaust emission data and exhaust gas management in its 2022 Sustainable Development Report, Chapter 8 Pollution Prevention and Control, page

CRITERION	RATING	COMMENT
		<p>81: <a href="http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>The Entity has established a Control Program for Exhaust Gas Management and installed a waste gas treatment facility including a bag-type dust collector. More information is available in the Pollutant Emissions in 2022 and Emission Reduction Plan in 2023: <a href="http://innovationmetal.com/d/file/p/2023/12-22/14ef51d23c9b28b62e06c328c0410e40.pdf">http://innovationmetal.com/d/file/p/2023/12-22/14ef51d23c9b28b62e06c328c0410e40.pdf</a></p> <p>The NOx Reduction Plan is publicly available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/927ff6904b3d5cadfed6a3a7c3529604.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/927ff6904b3d5cadfed6a3a7c3529604.pdf</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has publicly disclosed its discharge data and wastewater management in the 2022 Sustainable Development Report, Chapter 8 Water Utilization, page 80: <a href="http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>The Environmental Impact Assessment Report has been prepared by a Third Party, which includes the quantified Discharges to Water that have adverse effects on humans or the environment. The report showed that the sewage water included clean wastewater (the pollution factors include Total Phosphorus (TP), suspended solids (SS), petroleum products, pH, chemical oxygen demand (COD), total nitrogen (TN), animal and vegetable oils, ammonia nitrogen (NH3-N)), and domestic sewage.</p> <p>The Entity has established a sewage water discharge management procedure and has a wastewater treatment facility to treat wastewater. The Entity commissions a Third Party to test wastewater discharge after treatment annually.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established a management plan to prevent, detect and remediate Material Spills and Leakages (including compliance controls and a monitoring program). The Entity has stipulated the cycle and timing of the five-year review of the management plan. The 2022 Contingency Plan includes a Spill Management Plan for dangerous chemicals, item 8: <a href="https://www.innovationmetal.com/d/file/p/2023/12-22/b2fa67ba2a055864eefd4c99aff06e29.pdf">https://www.innovationmetal.com/d/file/p/2023/12-22/b2fa67ba2a055864eefd4c99aff06e29.pdf</a></p> <p>A Chemical Spill Management Plan of the Emergency Plan for Production Safety Accidents, is available at the following (on page 45): <a href="https://www.innovationmetal.com/d/file/p/2024/01-05/eef4f18b84be2645ecb801592e7ac28f.pdf">https://www.innovationmetal.com/d/file/p/2024/01-05/eef4f18b84be2645ecb801592e7ac28f.pdf</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable as there have been no incidents of Spills or Leakages. However, the Environmental Impact Assessment Report assesses the potential impact of Material Spills and Leakages as soon as practicable after an incident.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established waste control procedures, and implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The quantity of Hazardous and Non-Hazardous Waste generated in 2022 and the associated waste disposal methods are available at: <a href="https://innovationmetal.com/d/file/p/2024/02-25/e44ac66b3e1c8fcaae1c12d29acbc5e9.pdf">https://innovationmetal.com/d/file/p/2024/02-25/e44ac66b3e1c8fcaae1c12d29acbc5e9.pdf</a></p>

CRITERION	RATING	COMMENT
		Additional disclosure information is available in the Sustainable Development Report, pages 82-84: <a href="http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity has established waste control procedures and implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy. The storage volume of Aluminium Dross cannot be more than one-sixth of the annual Dross production volume. The amount of Dross generated is regularly monitored and disposed of regularly.</p> <p>A delegated contractor is responsible for the disposal and recycles Aluminium from Dross. The contractor has achieved 100% resource recovery of the Aluminium, and therefore landfill is not required.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has publicly disclosed its water use in its 2022 Sustainable Development Report, Chapter 8 Water Utilization, page 79: <a href="http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://www.innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p>
7.2a-e Water Management	Minor Non-Conformance	<p>The Entity established an ISO 50001:2018 certified Energy Management System with water-saving targets and measures to achieve objectives. The Water Resource Management Procedure outlines the process to manage water resources and mitigate risks. According to the procedure, the water management plan should be reviewed every five years, or after any changes, or if there are any control gaps. The Water Management Control Procedure is available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/57aa7668f9941cb9d64f024685442105.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/57aa7668f9941cb9d64f024685442105.pdf</a></p> <p>However, despite the procedure stating the importance of a water management plan, it was identified that water flow records are not retained, and information on sewage discharge quantity is currently unavailable.</p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Biodiversity Assessment Report for the Entity is available at: <a href="http://innovationmetal.com/d/file/p/2024/01-05/a43938702b87b86b18a0db9d8f3a51d0.pdf">http://innovationmetal.com/d/file/p/2024/01-05/a43938702b87b86b18a0db9d8f3a51d0.pdf</a></p> <p>Based on the Environmental Impact Assessment Report, there are no protected flora and fauna within the Entity's Area of Influence. The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The risks and potential impacts on Biodiversity and Ecosystem Services have been assessed as low.</p>

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, risks and potential impacts identified are assessed and documented as low. The Environmental Impact Assessment Report demonstrated that there are no protected flora or fauna within the Entity's Area of Influence.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity are assessed and documented as low. The Entity has assessed the Materiality and risk of impacts on Biodiversity resulting from its land use and activities in the Area of Influence.
8.4 Alien Species	Conformance	The Entity has consulted the Invasive Alien Species of China website ( <a href="https://www.plantplus.cn/ias">https://www.plantplus.cn/ias</a> ) to check for alien or invasive species and assessed the risk of potential impacts. The Entity is located in the Chaohu Industrial Park, developed by the local government. Based on the Environmental Impact Assessment Report, there are no protected flora or fauna in the area. The assessment showed that there are no major risks or significant risks and impacts on Biodiversity in the Area of Influence.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has a commitment to "No Go" in World Heritage Properties in its ESG and AS Policy: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cfl54.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cfl54.pdf</a>  The Entity is located in the Chaohu Industrial Park with no World Heritage Properties nearby.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an Industrial Park with no Protected Areas present.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a Code of Ethics and Business Conduct which makes it necessary to identify, prevent, mitigate and account for how the Entity addresses actual and potential impacts on Human Rights. <a href="http://innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021a9ea5e065df9e8dbe8d58.pdf">http://innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021a9ea5e065df9e8dbe8d58.pdf</a>  The Entity has publicly disclosed its Respect for Human Rights in its Sustainability Development Report, Chapter 6 Respect for Human Rights, pages 30-55: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a>  The Complaints Resolution Mechanism for Human Rights violations is included in the Employee Complaint Management Control Procedure, page 3: <a href="https://innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf">https://innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf</a>

CRITERION	RATING	COMMENT
		<p>The Entity has identified no Affected Populations or Organisations that may be affected by their operational activities as they are situated within an Industrial Park.</p> <p>To date, no Human Rights violations have been reported by the Entity. The Due Diligence process has been established to cover the supply chain. The Entity has established a complaints/grievance channel for Stakeholders. If there is a need to contact the Entity, the contact information for the Vice General Manager is available. No adverse impacts have been reported to date.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a Protection of Female Employees Procedure whereby women's rights and interests are respected. The Entity has identified legal rights for women and has implemented control measures to ensure Compliance.</p> <p>Information on the rights and interests of women are publicly disclosed in the Sustainable Development Report, Gender Structure, page 37: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.</p> <p>However, the Entity has established and implemented a Code of Practice for the Management of Indigenous Peoples and publicly disclosed the Policy, available at: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/255843674e3913ed7e519c3cb57ce31f.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/255843674e3913ed7e519c3cb57ce31f.pdf</a></p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable, as the Entity does not have any New Project or Major Change to existing Facilities. It is located in Caohu Industrial Park.</p> <p>However, the Entity has implemented a Code of Practice for Aboriginal Peoples. This requires the Entity to consult and cooperate in good faith with the Indigenous Peoples concerned through their own representative institutions to obtain their Free, Prior and Informed Consent (FPIC) (if applicable) before approving any project that affects their lands, territories, and resources.</p> <p><a href="http://www.innovationmetal.com/d/file/p/2023/12-22/255843674e3913ed7e519c3cb57ce31f.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/255843674e3913ed7e519c3cb57ce31f.pdf</a></p>
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 present where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	The Entity has established a program for the protection of Cultural and Sacred Heritage sites. The Entity is located in an industrial park where there are no sites of cultural and sacred heritage nearby and there are no new renovation or expansion projects currently planned.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no cultural and sacred heritage sites or values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no new renovations or expansion projects that we will require relocations. China's regulations on Environmental Impact Assessment require an Environmental Impact Assessment Report for all New Projects. Approval for construction is only granted if the Environment Impact Assessment Report is reviewed by the local regulatory authorities. The Entity avoids involuntary resettlement and compensates affected communities and Indigenous Peoples fairly if and when a situation arises.</p> <p>The Entity has established a Relocation and Affected People and Organisation Policy, available at:  <a href="http://innovationmetal.com/d/file/p/2023/12-22/b7a99c2070c4327e56e92f5b2201ea9d.pdf">http://innovationmetal.com/d/file/p/2023/12-22/b7a99c2070c4327e56e92f5b2201ea9d.pdf</a></p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity's operations do not have a negative impact on the Local Community. However, if and when new renovation and expansion projects occur, the Entity will initiate Environmental and Social Impact Assessments. The Environmental and Social Impact Management Plan for the initial establishment of the Entity is available at:  <a href="https://www.innovationmetal.com/d/file/p/2023/12-22/14a413edd85c17f5008fb88237f17b01.pdf">https://www.innovationmetal.com/d/file/p/2023/12-22/14a413edd85c17f5008fb88237f17b01.pdf</a></p> <p>The Entity has publicly disclosed its contribution to local social in its Sustainability Development Report, Chapter 12, 'Social Welfare', page 92: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has an integrated Management System that includes quality, environmental, Occupational Health and Safety, energy, and social responsibility. This system aligns with multiple ISO standards, including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, and SA 8000:2014. The supply chain is also considered within the Entity's Management System, with responsible procurement Policies, a Conflict Minerals and Conflict-Affected Areas risk control procedure, and annual Due Diligence on suppliers.</p> <p>The Entity has also established a Supply Chain Complaint Mechanism, which was publicly disclosed at:  <a href="https://innovationmetal.com/about/memcompany/3.html">https://innovationmetal.com/about/memcompany/3.html</a></p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Conflict-Affected and High-Risk Areas (CAHRAs) have been identified, and measures have been taken to advise, train, and warn high-risk suppliers. The Entity's Business or purchasing is not affected by CAHRAs according to information provided in the Sustainable Development Report.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a procedure for controlling the risk of conflict minerals and conflict-affected areas. This procedure includes sourcing management and supplier surveys that cover CAHRAs management. The Purchasing Policy, based on the ASI Performance Standard, requires communication with all suppliers and contractors and covers environmental, social, and governance aspects. The Entity has designed and implemented sourcing strategies to address identified risks.

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9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited against the ASI Performance Standard as part of this Audit. Due Diligence records confirmed no risk of conflict minerals, and no conflict-affected areas were found within the Entity's supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports supply chain Due Diligence annually – refer to the Sustainable Development Report, Chapter 7 Supplier Management, page 7: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a>
9.9 Security practice	Conformance	<p>The Entity has established Security Management Regulations, which require security personnel to respect Human Rights. The Entity's ASI Policy and the Code of Ethics and Business Conduct includes a commitment to respecting Human Rights. The Policies are available for both internal and external Stakeholders.</p> <p>ESG and ASI Policy: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cfl54.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cfl54.pdf</a></p> <p>Code of Ethics and Business Conduct: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/fablccd3021aead5e065df9e8dbe8d58.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/fablccd3021aead5e065df9e8dbe8d58.pdf</a></p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union with approximately 675 members among its staff. The Labour Union Constitution outlines the union representative election process and member's rights.
10.2a Child Labour	Conformance	The Entity has established a Protection of Underage Workers Procedure in alignment with ILO Conventions C138 and C182, relating to Child Labour, which specifies that Child Labourers under 15 may not be employed, and it is also prohibited to arrange for underage Workers to be engaged in hazardous work. During the Audit, it was confirmed that the youngest employee working at the Entity is 19 years old.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Voluntary Employment and Prohibition of Forced Labor Management Procedure which specifies the prohibition of Forced Labour.</p> <p>The Modern Slavery Statement is included in the Sustainable Development Report, Chapter Respect for Human Rights, page 38: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a></p> <p>Interviews with employees including Management and operators demonstrated that they are freely and willingly employed. There is no retention of employees' personal effects, and there are no requirements to lodge deposits or security payments.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Control Program, ensuring no hiring restrictions based on ethnicity, nationality, political affiliation, gender, race, sexual orientation, marital

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		status, family responsibilities, age, or any other circumstances that may give rise to Discrimination. All employees have received Human Rights and Anti-Discrimination training. There have been no cases of dismissals, and all departures are voluntary.
10.5 Communication and engagement	Conformance	The Entity has implemented an Employee Handbook which has been issued with information on lines of communication for employees or employee representatives and a commitment that whistleblowers will not be threatened with retaliation, intimidation, or harassment. During the Audit, a test of the whistleblower's phone number was conducted.
10.6a-g Violence and Harassment	Conformance	The Entity's ASI Policy includes a commitment for the elimination of Violence and Harassment: <a href="http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cf1ec5f154.pdf">http://www.innovationmetal.com/d/file/p/2023/12-22/bb56222acdd27ccad1a8c2cf1ec5f154.pdf</a>  There is a Management Review Control Procedure that specifies a review is to be conducted once a year and when there are significant changes or defects. Interviews with staff representatives, female operational staff, representatives of women's trade unions and supplier employees confirmed that there were no incidents of Violence and Harassment.
10.7a-c Remuneration	Conformance	The Entity has established Control Procedures for Hours of Work and Payroll Administration to ensure payments of wages are timely, in legal tender and fully documented. The Entity's calculation of Overtime compensation meets regulations. Interviews with employees confirmed they are satisfied with their salaries.
10.8a-c Working Time	Minor Non-Conformance	The Entity's Overtime compensation calculation method complies with regulations. However, a sample of six employees' schedules over six consecutive months showed that two individuals exceeded the daily limit of eight hours of Overtime. Although they applied for Overtime voluntarily, this represents isolated violations of labour law.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed employees of their rights during the signing of their employment contract contracts which are detailed in the employee handbook. Social Responsibility training given to employees covers lawful Freedom of Association.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO45001:2018 certified Occupational Health and Safety (OH&S) Management System, including a management manual and procedural documents. The Management System is internally audited and is reviewed annually.  The latest external audit of the Entity's OH&S Management System identified no major non-conformances, with a total of two minor non-conformities raised and corrective actions finalised.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has publicly disclosed the performance achievement of the OH&S Management System in the 2022 Sustainable Development Report, Chapter Employee Health and Safety, page 57: <a href="http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf">http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf</a>



CRITERION	RATING	COMMENT
		The Entity publicly discloses its OH&S Management System achievements for 2023: <a href="https://innovationmetal.com/d/file/p/2024/02-25/71cb1d41da173d0579116e1d2843b8c0.pdf">https://innovationmetal.com/d/file/p/2024/02-25/71cb1d41da173d0579116e1d2843b8c0.pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented a Safety Committee and a trade union. The Safety Committee is responsible for formulating and revising the Production Safety Management System, organising regular production safety inspections and keeping records. The Committee conducts employee satisfaction surveys, collects suggestions or opinions on OH&amp;S from employees and provides the results of implementation of recommended corrective actions.</p> <p>The Labour Union and Safety Committee annually investigate and analyse work safety accidents, formulate improvement measures, and ensure implementation. Employees at the shift level report weekly on potential OH&amp;S hazards, and the Safety Committee identifies and implements corrective actions and verifies their effectiveness over time.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 April 2024	Initial Certification Audit – Full Certification