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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**GUANGYUAN  
LINFENG ALUMINUM  
& ELECTRICITY CO.,  
LTD**

CERTIFICATE  
NUMBER

224

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

SGS-CSTC  
STANDARDS  
TECHNICAL  
SERVICES

DATE OF ISSUE

22 NOVEMBER 2022

DATE OF EXPIRY

21 NOVEMBER 2025

CERTIFIED SINCE

22 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

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)**

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CERTIFICATION SCOPE

Aluminium smelting processes for the manufacture  
of electrolytic Aluminium liquid at Guanyuan  
Linfeng Aluminum & Electricity Co., LTD.,  
Guanyuan City, Sichuan Province, China.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
ENTITY NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
CERTIFICATION SCOPE	Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminum & Electricity Co., LTD., Guangyuan City, Sichuan Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (11 – 13 July 2022)</li><li>Surveillance Audit (12 – 13 March 2024)</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>11 – 13 July 2022 (Initial Certification Audit)</li><li>12 – 13 March 2024 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 September 2022 (Initial Certification Audit)</li><li>11 May 2024 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (11 – 13 July 2022)</u></p> <p>The audit scope included the Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminium &amp; Electricity Co., LTD.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Initial Certification Audit (11 – 13 July 2022)</u></p> <p>The audit scope included the Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminium &amp; Electricity Co., LTD.</p>

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Supply chain activities included in the audit scope:

- Aluminium Smelting

All relevant criteria in the ASI Performance Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Certification
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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.
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CERTIFICATION  
PERIOD

22 November 2022 – 21 November 2025

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NEXT AUDIT  
TYPE

Re-certification Audit

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NEXT AUDIT  
DUE DATE

21 November 2025

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CERTIFICATE  
NUMBER

224

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a Management System to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-Corruption procedure consistent with international standards and state regulations.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct that includes principles relevant to environmental, social and governance performance. All employees are trained on these principles. The Entity has reviewed compliance with the Code of Conduct.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established and implemented an environmental, social and governance Policy. The Company ASI Policy is available on the Entity's website: <a href="http://www.zfsy.com.cn/lfdinfo.html">http://www.zfsy.com.cn/lfdinfo.html</a> The Entity has developed a series of procedures to implement the Policy and regularly review their performance. The Policy is reviewed annually, and the latest review was conducted during the Management Review Meeting on February 28, 2024.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented an environmental, social, and governance Policy approved by the General Manager. The Policy is reviewed annually, and the latest review was conducted during the Management Review Meeting on February 28, 2024.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has implemented an environmental, social and governance Policy that is available on the bulletin board in the factory and on the website: <a href="http://www.zfsy.com.cn/lfdinfo.html">http://www.zfsy.com.cn/lfdinfo.html</a>
2.2 Leadership	Conformance	The Entity has nominated the Chief Engineer as the senior Management Representative with the overall responsibility and authority to ensure conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an integrated Energy, Environmental, and Occupational Health and Safety (OH&S) Management System. The Entity's Management System is ISO 14001 certified.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established a Social Accountability Management System that is based on SA8000 (not yet certified), and which includes various Policies, procedures and a management manual.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues: <a href="http://www.zfsy.com.cn/lfdinfo.html">http://www.zfsy.com.cn/lfdinfo.html</a> Implementation of the Responsible Sourcing Policy addresses establishing and completing the supplier evaluation checklist and a supplier audit plan.
2.5 Impact Assessments	Conformance	The Entity has conducted Environmental, Social, Cultural and Human Rights Impact Assessments for New Projects or Major Changes to existing Facilities. The local authority has approved the Impact Assessment, and the report is publicly available. It covers air, water, soil, groundwater, acoustic environment, social impacts and local human health and community. In 2023, there were no changes in the environment around the Entity.
2.6 Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans, which have been registered with the local authority. Drills are undertaken according to the plan and the effectiveness of the drills are evaluated.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. To date, no mergers or acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the planning process for closure, decommissioning and divestment. To date, no closure, decommissioning or divestment has occurred.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the 2023 Sustainability Report: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161320.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161320.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has disclosed in its Compliance Operation Report that no significant fines, judgements, penalties or non-monetary sanctions for failure to comply with Applicable Law during 2023: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161">http://www.zfsy.com.cn/uploadFiles/files/20240423161</a>

CRITERION	RATING	COMMENT
		<a href="#">304.pdf</a> This has been verified on the National Enterprise Credit Information System.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has established management procedures to ensure compliance with legal requirements for payments to the government and prohibit any payments that are not in accordance with the law. A third-party financial audit report has verified the Entity's transactions.
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	Minor Non-Conformance	The Entity has implemented an accessible Complaints Resolution Mechanism, as evidenced in its communication management program and the complaints control procedure. Complaints can be made via the contact details available on the website: <a href="http://www.zfsy.com.cn/lxwm.html">http://www.zfsy.com.cn/lxwm.html</a> However, the procedures regarding the complaint mechanism do not allow interested parties to voice concerns about non-compliance with the Responsible Sourcing Policy in the Aluminium supply chain.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of Aluminium liquid. The Life Cycle Assessment (LCA) research scope addressed four stages of the electrolytic Aluminium production life cycle: raw material acquisition, transportation, smelting production and downstream product disposal. The LCA Report discloses information on energy/resource consumption and pollutant emissions per tonne of product during each stage: <a href="http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf</a> The Entity has not completed its LCA Report in 2023 and has entrusted a qualified institute to complete the LCA Report and Greenhouse Gases Emissions Inventory by the end of October 2024.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental LCA Report can be provided upon request. However, there have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA Report is published on the Entity's website: <a href="http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220711164637.pdf</a>
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's

CRITERION	RATING	COMMENT
		Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable, as there is no aluminium scrap produced from the production of electrolytic Aluminium liquid.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable, as the Entity only produces Aluminium liquid.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity has calculated its Greenhouse Gases (GHG) Emissions and energy use by source on an annual basis. The 2021 annual GHG Emissions Evaluation Report, which is verified by a third party, is available at:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf</a></p> <p>The Entity's 2021 Energy Report is available at:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20220712164249.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220712164249.pdf</a></p> <p>However, the Entity did not publicly disclose their GHG emissions for 2022 and 2023. Also, the 2021 GHG Emissions Report did not include Scope GHG Emissions 3 data.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has published timebound GHG Emissions reduction targets in the 2022 GHG Emissions Reduction Plan:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20220825162408.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220825162408.pdf</a></p> <p>The summary of CO<sub>2</sub> reduction performance in 2023 has been publicly disclosed at:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161006.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161006.pdf</a></p> <p>In the summary of the CO<sub>2</sub> Reduction Projects 2023, the Entity's CO<sub>2</sub> reduction plan covered the Material sources of Direct and Indirect GHG Emissions.</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity has implemented an Energy Management System and obtained ISO 50001:2018 certification. The Entity has publicly disclosed the GHG Emissions Evaluation Report:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220815080528.pdf</a></p>

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has calculated its GHG Emissions, which are verified by a third party, and implemented a GHG Emissions Reduction Plan to reduce emissions to below 8 tonnes of CO <sub>2</sub> -eq per metric tonne Aluminium by 2030.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable, as the Entity commenced production prior to 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has quantified and reported Emissions to Air that have adverse effects on humans or the environment: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161042.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161042.pdf</a> The Entity has installed waste gas treatment facilities according to the Environmental Impact Assessment (EIA) Report to minimise adverse impacts.
6.2 Discharges to Water	Conformance	The Entity has quantified and reported Discharges to Water that have adverse effects on humans or the environment: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161042.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161042.pdf</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has assessed major risk areas of operations where Spills and Leakages may contaminate air, water and/or soil. The Risk Assessment Report is publicly available: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161636.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161636.pdf</a>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has assessed major risk areas of operations where Spills and Leakages may contaminate air, water and/or soil. The Entity has established an Emergency Response Plan for environmental incidents to prevent and detect Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established a program to disclose information about significant Spills and Leakages to affected parties and local authorities immediately after an incident. The disclosure includes the volume, type and potential impact of the Spills and Leakages according to local laws. There have been no Spills since the Entity's establishment.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses the Impact Assessments of Spills and remediation actions taken, and publicly reports on an annual basis. There have been no Spills since the Entity's establishment.



CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy designed in accordance with the Waste Mitigation Hierarchy. This strategy includes transferring waste to qualified suppliers for treatment and reusing Aluminium ash. Workshop employees are trained in the steps to minimise waste generation.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses the Hazardous and Non-Hazardous Waste generated and the methods of disposal: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161115.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161115.pdf</a>
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.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and the responsibilities of personnel. The SPL material, the lining material and the refractory brick are reused. SPL is stored in a dedicated warehouse designed to prevent leaks.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity had implemented a SPL management procedure that addresses the storage of SPL and the responsibilities of personnel. The SPL material, the lining material and the refractory brick are reused. The SPL is treated as Hazardous Waste and transferred to a qualified supplier for disposal in accordance with legal requirements.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity had implemented a SPL management procedure that addresses the storage of SPL and the responsibilities of personnel. The SPL is treated as Hazardous Waste and transferred to a qualified supplier for disposal following legal requirements.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity had implemented a Spent Pot Lining (SPL) management procedure that addresses the storage of SPL and responsibilities. The SPL cleaned up in 2023 was temporarily stored in the factory due to insufficient transfer volume. When the accumulated amount is sufficient, it will be entrusted to a downstream disposal enterprise for disposal. The Entity signs a contract with a local enterprise with hazardous waste disposal qualifications every year to facilitate the transfer of vehicles at any time. In this enterprise, SPL disposal methods include incineration and extraction of Aluminium metal.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity had implemented a SPL management procedure that addresses the storage of SPL and the responsibilities of personnel. The Entity does not discharge SPL to marine or aquatic environments.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resource Management Report and Environmental Impact Assessment (EIA) Report. The Entity's water is supplied by the local municipal, and all wastewater is recycled. The Entity records its monthly water usage, showing that the Entity's water consumption from the river is decreasing annually.
7.1b Water assessment (risk assessment)	Conformance	The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resource Management Report and Environmental Impaction Assessment Report. The water-related risks in the Entity's Area of Influence have been assessed: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161223.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161223.pdf</a> The risk assessment identified the Entity's water-related risk as low.
7.2a Water management (management plans)	Conformance	The risk assessment identified the Entity's water-related risk as low. The Entity has recorded its water usage monthly and does not discharge wastewater. An emergency plan for discharging water in

CRITERION	RATING	COMMENT
		extraordinary situations is established and the Entity has provided training on the emergency plan to all employees.
7.2b Water management (monitoring)	Conformance	The risk assessment identified the Entity's water-related risk as low. The Entity's water resource monitoring plan has been effectively implemented.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water withdrawal and use and its water-related risks in the Water Resources Assessment Report: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161223.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161223.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity is located in an industrial park developed by the local government. An Environmental Impact Assessment (EIA) was undertaken for the Entity's new plant construction project in 2019, which assessed the risk and Materiality of the impact on Biodiversity from the land use and activities in the Entity's Area of Influence. The local government has approved the EIA and published it on the authority's website. Habitat degradation due to air and water pollution was identified as the main risk to Biodiversity. As such, the Entity has established and implemented management plans to monitor Emissions to Air and Discharges to Water.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has established a Biodiversity Action Plan, implemented control measures and reported on the outcomes: <a href="http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf</a> The Entity has implemented management plans to monitor the air emissions and wastewater discharge to address impacts on Biodiversity. Since the last Biodiversity Assessment, there has been no change in the local Biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established a Biodiversity Action Plan based on the findings of the EIA for the Entity's new plant construction project in 2019 and the EIA associated with the government development of the industrial park. These assessments determined that the Entity was not located in farmland, a construction expansion restricted zone or a prohibited zone (ecological preservation area).
8.2c Biodiversity management (reporting)	Conformance	The Entity has published the outcomes of Biodiversity management in the Biodiversity

CRITERION	RATING	COMMENT
		<p>Assessment Report:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220711164649.pdf</a>            No changes were reported since the last audit.</p>
8.3 Alien Species	Conformance	The Entity has established a procedure to prevent the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity.
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	<p>The Entity has established a Human Rights Policy, including a Policy commitment to respecting human rights. The Policies are available for internal and external Stakeholders via training, posts on-site and the website. Company ASI Policy:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161135.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161135.pdf</a></p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has established a Human Rights Due Diligence procedure that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Entity has published a Human Rights Due Diligence Report:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161206.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161206.pdf</a></p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>There were no Human Rights violations found at the Entity. The Entity has published a Human Rights Due Diligence Report:  <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161206.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161206.pdf</a></p>
9.2 Women’s Rights	Conformance	The Entity has established the Women’s Rights Management procedure, which clearly defines the rights protection for women. Interviews with the Entity’s ASI Management Representative and the

CRITERION	RATING	COMMENT
		female employees demonstrated there were no violations of women's rights and female employees know their rights and how to raise their concerns.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the industrial park where the Entity is located. However, the Entity has established and implemented an Indigenous Peoples management procedure that includes their commitment to respect the rights and interests of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the industrial park where the Entity is located. However, the Entity has established an Indigenous Peoples Protection and Free, Prior and Informed Consent (FPIC) procedure.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as the Entity is located in an industrial park provided by the local government, and there are no cultural and sacred heritage sites nearby.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, the Entity is located in an industrial park and resettlements are not required. However, the Entity has established a resettlements management procedure.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, the Entity is located in an industrial park and resettlements are not required. However, the Entity has established a Resettlements management procedure.
9.7a Local Communities (rights and interests)	Conformance	Even though the Entity is located in an industrial park, they have established a Local Communities Management Procedure that addresses the Entity's commitment to respect the rights of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has established a Local Communities Management procedure that addresses appropriate steps required to prevent and address any adverse impacts. The Entity has established a communication procedure with external Stakeholders and has not received any complaints.
9.7c Local Communities (livelihoods)	Conformance	The Entity is committed to exploring opportunities with Local Communities and supporting their livelihoods. They also employ people from the Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located within Conflict-Affected and High-Risk Areas (CAHRAs) and does not contribute to or support suppliers in CAHRAS. The Entity commits

CRITERION	RATING	COMMENT
		to not using conflict minerals and communicates this through the Aluminium value chain in its Responsible Sourcing Policy: <a href="http://www.zfsy.com.cn/uploadFiles/files/20240423161135.pdf">http://www.zfsy.com.cn/uploadFiles/files/20240423161135.pdf</a>
9.9 Security practice	Conformance	The Entity has defined a security practice management procedure and implemented security practices that respect Human Rights. No Human Rights violations related to security were identified.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable, as the Entity follows national law in regard to Freedom of Association and Right to Collective Bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable, as the Entity follows national law in regard to Freedom of Association and Right to Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has implemented trade union activities according to local regulations, including meeting with trade union representatives at planned intervals.
10.2a Child Labour (minimum age)	Conformance	The Entity has documented and implemented a Policy that prohibits Child Labour. There is no Child Labour or young Workers in the Entity.
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 are not allowed to work in hazardous working conditions. There is no Child Labour or young Workers in the Entity
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. There are no Workers under 18 years old in the Entity.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour and is not involved in Forced Labour, including slavery and Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. All Workers are hired directly, and Workers are not required to provide any form of deposit, Recruitment Fee or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. There are no foreign Migrant Workers in the Entity.

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. The Entity does not provide any type of loan to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. There is no restriction on the Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. The Entity does not retain the Workers' original documents, only copies are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established a procedure that addresses the prohibition of Forced Labour. Workers can terminate their employment within the notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the Labour Contract Law.
10.4 Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination management procedure and an employee handbook that outlines Anti-Discrimination rules for Workers. Employees understand the requirements and there has been no case of Discrimination received.
10.5 Communication and engagement	Conformance	The Entity has established a communication and participation management procedure to ensure direct and frequent communication with the Workers and Workers' representatives. There is a suggestion box in the workshop where Workers can raise concerns or complaints.
10.6 Disciplinary practices	Conformance	The Entity has established a disciplinary management procedure. Disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved.
10.7a Remuneration (living wage)	Conformance	The Entity has established a compensation and benefits management procedure. All Workers are enrolled in the mandatory social insurance scheme and average wages exceed the local mandatory wage.
10.7b Remuneration (method of payment)	Conformance	The Entity established a salary management procedure. The total payment meets the workers' basic needs, and all workers are enrolled in the mandatory social insurance scheme. The Entity's minimum wage and high-temperature allowance are higher than those defined in the Guangyuan City

CRITERION	RATING	COMMENT
		2023 Standard. The Entity's salary management procedure states that wage payments are made by bank transfer on the 25th of every month according to the labour contract.
10.8 Working Time	Conformance	Based on the document check, it was found that the Working Time management procedure has been defined according to legal requirements. Employee working Time records from July to December 2023 showed that every employee's Working Time was summarised monthly, including workdays (including Overtime working hours), public holidays and paid annual leave. Based on the sampled attendance records of two employees, there are no violations of the legal requirements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification. The OH&S Policy is published in the Company ASI Policy: <a href="http://www.zfsy.com.cn/uploadFiles/files/20220711164548.pdf">http://www.zfsy.com.cn/uploadFiles/files/20220711164548.pdf</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has established an OH&S Policy that applies to all Workers and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established an OH&S Policy, which includes a commitment to comply with Applicable Law, international standards, and ILO Conventions on OH&S. This includes, where relevant, consultation on OH&S with Workers or their representatives in accordance with ILO Convention 155.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established an OH&S Policy that addresses Workers' right to understand the hazards and safe practices and the right to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established OH&S Management System and obtained ISO 45001:2018 certification.
11.3 Employee engagement on health and safety	Conformance	The Entity has established an OH&S Management System that addresses the participation and engagement of Workers on OH&S issues.
11.4 OH&S performance	Conformance	The Entity has established an OH&S Management System that addresses performance evaluation.



## **Document Control and Version History**

Revision	Date	Notes
0	22 November 2022	Initial Certification Audit – Full Certification
1	31 May 2024	Surveillance Audit