

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CHINALCO-SWA Co., Ltd.

CERTIFICATE NUMBER
346

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
8 MARCH 2024

DATE OF EXPIRY
7 MARCH 2027

CERTIFIED SINCE
8 MARCH 2024

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Manufacturing of aluminum plates
and strips at the CHINALCO-SWA
Co., Ltd. production plant (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	CHINALCO-SWA CO.,Ltd.
ENTITY NAME	CHINALCO-SWA Co, Ltd.
CERTIFICATION SCOPE	Manufacturing of aluminum plates and strips at the CHINALCO-SWA Co, Ltd. production plant (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">8 – 11 October 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2023
AUDIT SCOPE	<p>The audit scope included the manufacturing of aluminum plates and strips at the CHINALCO-SWA Co, Ltd. production plant (China).</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	8 March 2024 – 7 March 2027
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE 7 September 2025

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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.

ENTITY OVERVIEW

The CHINALCO-SWA CO., Ltd. facility is located in Xipeng, Jiulongpo District, Chongqing and was established in 2004. The Entity is located within an industrial park developed by the local government and the area under management is approximately 235,000 square meters. It mainly produces aluminium and aluminium alloy plates, strips, foils, tubes, rods, profiles and forgings, forming a series of pillar products for aerospace, transportation, electronic information, packaging and printing, building decoration and other aluminium products.

The Entity employs approximately 397 employees on-site, and most employees are from the local area. The Entity is in close contact with surrounding communities.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a 'Laws and Regulations Control Procedure', a detailed description for the conduct of audits and a list of Applicable Law. The Environment, Health and Safety (EHS) Department and Administration Department are responsible for the collection and assessment of laws and regulations, which occur at least annually.</p> <p>However, not all Applicable Law has been collected and assessed to determine the Entity's Compliance.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an 'Anti-Corruption and Anti-Bribery Management Procedure'. The Entity has established an anti-Bribery management team and regular assessments have been carried out. A Bribery risk assessment level standard has been established and employees have been regularly trained.</p> <p>The Entity's Administration Department evaluates the implementation of anti-Bribery activity undertaken annually to determine whether anti-Bribery measures are sufficient and effective, and revise their Bribery risk status.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has formulated a Code of Conduct, which addresses environmental, social and governance principles. The Entity conducts annual internal audits and management reviews to review the Code of Conduct. The Code of Conduct is revised on any changes in law and business trends. Staff awareness of the Code of Conduct is raised through various measures, including meetings and training.</p> <p>The Code of Conduct is available at: https://xn1.chinalco.com.cn/bdgs/bdgsdg</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established the Environment, Governance, Society, Responsible Procurement Policy, which has been approved by the plant General Manager and is publicly available at: https://xn1.chinalco.com.cn/bdgs/bdgsdg</p> <p>The Entity has established the ASI Performance Standard Manual, which includes the Policies and Procedures.</p>
2.2a-c Leadership	Conformance	<p>A senior Management Representative has been appointed and their responsibility and authority have been clearly defined. This role has overall responsibility and authority for ensuring Conformance with the ASI Performance Standard, implementation and communication of the relevant Policies, and providing the necessary resources to establish, implement, maintain and improve the Management Systems required.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has developed and implemented an integrated Management System and has obtained ISO 14001:2015 and ISO 45001:2018 certification. The ASI Management System has been</p>

CRITERION	RATING	COMMENT
		established and internal audits and management reviews are conducted annually to ensure its effectiveness.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Environment, Governance, Society, Responsible Procurement Policy is reviewed at least every five years or after any changes to the Business or risks, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg</p> <p>Responsible sourcing is implemented by the Entity through the signing of ASI Commitment Letters and supplier assessments to ensure they implement the ASI Performance Standard requirements.</p> <p>However, the Entity has not implemented the Supplier Management Procedure effectively, and not all suppliers were managed according to the internal procedure, had signed commitment letters or had been assessed.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to the existing Facility have occurred since the Entity joined ASI, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to the existing Facility have occurred since the Entity joined ASI, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has a valid ISO 14001 and ISO 45001 certification. Emergency Response Plans have been developed and implemented, and the Plans are reviewed every five years, or after any changes to the Business, or changes in the nature or scale of emergency incident risk management in accordance with legal requirements. Personnel training and drill records are maintained. The Emergency Response Plan is publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a resilience plan that addresses situations for suspending or significantly altering operations due to conflict, pandemics, natural disasters, cyber-attacks and other situations. This plan was successfully implemented during COVID-19 and demonstrated the readiness of the Entity to address factors outside its control and the adequacy of its resources.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the Mergers and Acquisitions Management Procedure. Until now, no mergers or acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There are no closure, decommissioning or divestment activities currently planned. However, should such activities become applicable, the review of environmental, social and governance practices and

CRITERION	RATING	COMMENT
		development of a plan, including consultation as necessary, will be driven by corporate functional teams, with the participation of Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity has developed an annual Sustainability Report that describes their sustainability approach, and summarises their environmental and social impacts: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p> <p>However, the quality of the Sustainability Report is low as it lacks sufficient detail and quantifiable data.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>No non-Compliance or liabilities were recorded in the Sustainability Report, nor raised by government agencies or included in the government and non-government related websites at: https://www.gsxt.gov.cn and https://www.qcc.com</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has only made, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in their Annual Financial Audit Report and tax payment certificates are available. The Financial Report information is available at: https://www.gsxt.gov.cn/index.html</p> <p>No financial or in-kind political contributions are made by the Entity, which is disclosed in the Sustainability Report: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established and implemented a Stakeholder Complaints, Grievances and Requests Procedure, which addresses the communication of the Entity's telephone number, email address, suggestion box and other information to Stakeholders through public boards, accepting information inquiries, complaints and appeals from all parties. The Entity's Human Resources Department monitors Stakeholders' requests and complaints and has an appropriate resolution mechanism. The Feedback Management Procedure is available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has established a Life Cycle Assessment (LCA) Management Procedure and has developed an LCA for its Aluminium Products. However, the LCA did not provide a complete life cycle evaluation, and does not completely fulfill the requirements of the ISO 14040 and ISO 14044 standards.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has provided adequate cradle-to-gate LCA information on its Aluminium Products, which was conducted in accordance with ISO the 14040 and ISO 14044 standards to advance the consistency and comparability of assessments. LCA studies are available upon customer request and at: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p>

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity has established and implemented a Product Design Procedure, which integrates relevant objectives in the design and development process for Products to enhance their sustainability, including the environmental life cycle impacts of the end Product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its operations and targets 100% of scrap for collection, recycling and/or re-use. The Entity has a Scrap Classification and Management Procedure to classify and dispose of the different types of Aluminium scrap. Scrap is separated by alloy and sent for recycling.
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	Minor Non-Conformance	<p>The Entity has developed a recycling strategy including specific timelines, activities and targets. There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. However, the Entity has communicated with its main customers on how to improve the recycling rate of Products at End of Life. The Entity maintains records associated with its recycling contracts with customers for the collection of scrap of Products at End of Life.</p> <p>However, the Entity's actions and measures are not sufficiently visible in the strategy and there is no specific representation in the five-year plan.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has accounted for and publicly disclosed its annual Material Greenhouse Gas (GHG) emissions and energy use by source in its Greenhouse Gas Inventory Report, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg</p> <p>The GHG emissions data are checked by a Third Party.</p> <p>However, the published emissions data within the Business boundary are too general and emission factors are not listed.</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	Minor Non-Conformance	The Entity has established GHG emissions reduction targets for the next five years. The main strategy is to reduce electricity consumption and increase the ratio of green energy. The Entity has reviewed the GHG Emissions Reduction Plan annually or when there are any changes to the Business that alter baselines or targets. The Reduction Plan is available at:

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		<p>https://xnl.chinalco.com.cn/bdgs/bdgsdg</p> <p>However, the GHG Emissions Reduction Pathway did not address a 1.5°C Warming Scenario and does not include regular Intermediate Targets or an 'endpoint' target for 2050.</p>
5.4 GHG Emissions Management	Conformance	The Entity had established a GHG emissions Management System, which includes related tools, a database, an inventory and targeted emission reduction pathways. The Entity has established a GHG Emissions Management Procedure and emission source identification table to monitor the GHG emissions and achieve performance aligned with the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The pollutants in the Entity's Emissions to Air are quantified in the Environmental Impact Assessment report. Pollutant reduction facilities are in use. Emission levels are monitored monthly, and the Entity meets local legal emission limits. The Entity's plan to minimise exposure to and impacts from Emissions to Air is provided in the Wastewater and Gas Emissions Reduction Plan, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
6.2a-g Discharges to Water	Conformance	The Entity has implemented an Environmental Management System that addresses and manages Discharges to Water. The Entity has established water reduction targets and a plan to minimise adverse impacts. The monitoring results for the major pollutants in wastewater meet the local legal discharge limits. The Entity's plan to minimise exposure to and impacts from Discharges to Water is provided in the Wastewater and Gas Emissions Reduction Plan, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted regular Spills and Leakages assessments. No high-risk situations are identified, and the Entity has taken preventive actions or implemented improvement programs for the potential risks identified. The assessment and management of Spills and Leakages, including the control measures based on Spill risk factors, is defined in the Entity's Environmental Management System. Major Spills and Leakages are handled and communicated by the Emergency Response Team. The Leakage and Leakage Factor Management Plan is reviewed at least annually and is available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established an Emergency Response Plan and Response Guide that addresses the management of and reporting of Spills. If there is a Spill, the Emergency Response Team follows the response. Spill drills are conducted annually to ensure the process is up to date. No Spill has occurred in the past few years. The Emergency Response Plan and Response Guide defines the requirement for the Entity to report Spills to local authorities and impacted units and people immediately, and to disclose the incident in the Sustainability Report, section 5.6.6, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System, which includes a Waste Management Procedure that defines the processes to collect and dispose of all Waste. The Entity has established continual improvement targets to reduce Waste generation per unit. The targets are reviewed quarterly by the management team. The annual quantity of Hazardous and Non-Hazardous Waste generated and their disposal methods are reported in the Sustainability Report, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has undertaken a water-related risk assessment, including water balance, to determine and map the source and type of water it withdraws and uses. The Entity has a water balance statistical data table for 2022, water resources management goals and plans, and a water balance chart. The water risk assessment considered the Entity's industrial park, nearby lands and waterways risk in their Area of Influence. Due to the nature of the product and production processes, and that most of the Entity's processes include a closed-loop water management system, the level of water-related risk was found to be low. The Water Balance Test Report is available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined there were no significant water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES RISK AND IMPACT ASSESSMENT		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has established procedures for the protection of Biodiversity. The Entity is located in an industrial park developed by the local government, and there is no protected flora or wildlife within the area. The Entity has prepared a Biodiversity Assessment Report, which determined there is no significant risk or impact on Biodiversity.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impact on Biodiversity or Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impact on Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.

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8.4 Alien Species	Conformance	The Entity has stipulated relevant requirements for Alien Species in the protection of Biodiversity procedures, including evaluating and controlling risks of Alien Species, which are accidentally introduced through operational activities. The Biodiversity risk assessment identified wooden pallets as the only potential source of Alien Species, and all pallets are fumigated before use.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity has committed to not explore or develop New Projects in World Heritage Properties in its ASI Performance Assurance Manual. The Entity is located in an industrial park developed by the local government, and is not within a World Heritage site.
8.6a-d Protected Areas	Conformance	The Entity is located in an industrial park developed by the local government, and there are no Protected Areas in this area. Regardless, the Entity has stipulated the relevant requirements in the ASI Performance Assurance Manual.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has established the Environment, Governance, Society and Responsible Procurement Policy, which includes a commitment to respect Human Rights and employees' civil rights, and to eliminate Discrimination. The Policies are reviewed at least every five years or in response to the annual HSE and social risk assessment. Employees are provided training on the Policy. The Policy is available on-site and published on the website: https://xnl.chinalco.com.cn/bdgs/bdgsdg</p> <p>The Entity has established a Human Rights Due Diligence Procedure, conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report, which determined that no adverse Human Rights impacts have been reported since its establishment. The Human Rights Due Diligence process covers the Entity's supply chain.</p> <p>However, the audit found that some suppliers did not complete the Human Rights Due Diligence assessment.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Women's Protection Management Procedure that includes protecting women's rights and interests, and has established control measures to ensure that the rights were met. The Entity has implemented a Gender Equality Project Implementation Plan, which is reviewed annually, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) -	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.

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New Projects or Major Changes		
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence and Free, Prior and Informed Consent (FPIC) has not been required.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has formulated a Cultural and Sacred Heritage Protection Management Procedure. The Entity is located in the industrial park developed by the local government, and based on the Construction Project Environmental Impact Report, there are no cultural or sacred heritage sites or values.
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 and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since joining ASI that could cause displacement, or require Resettlement or land acquisition.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented an Affected Populations and Organisations Management Procedure to commit to respecting the legal and customary rights and interests of Affected Populations and Organisations in their lands and livelihoods and their use of natural resources, while exploring opportunities to respect and support community livelihoods with the Industrial Economic Zone. There have been no complaints received from Local Communities.</p> <p>The Entity is in close contact with surrounding communities and the majority of Workers are from the local area. The Facilities have installed environmental protection devices to reduce the impact on the surrounding communities caused by air emissions and boundary noise, which is indicated in the Environmental Impact Assessment report. The Entity participates in community public welfare activities, and has established a Community Management System and Implementation Plan to support the surrounding communities, available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established a Management System that includes a supply chain Policy, responsibilities and resources, information gathering and supplier engagement.</p> <p>A review of internet resources and interviews with management, employees and workshop managers, confirmed the Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risks Areas (CAHRAs). The Entity's CAHRA Policy is available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg</p>

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9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a risk-based Due Diligence process on their supply chain, which is embedded in the integrated Management System and the Purchasing Procedures. The Due Diligence processes did not identify any actual or potential risks in the supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk-based Due Diligence did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted a risk-based Due Diligence process on their supply chain and the supply chain and suppliers are reviewed annually. The Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported on its supply chain Due Diligence in accordance with by requirements of its Conflict Minerals Policy and supplier sustainability approach. The Entity's Supply Chain Due Diligence Report is available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg
9.9 Security practice	Conformance	The Entity has implemented a Security Service Management Procedure and has defined the primary role of security guards to protect people, property and/or assets, and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has implemented a Freedom of Association and Collective Consultation Procedure to respect Workers' right to Freedom of Association and Collective Bargaining. A Labour Union and an association for Workers have been established in accordance with the legal requirement, and addresses Workers' rights on Remuneration, working hours, rest and vacation, safety and health, vocational training, insurance and welfare. Although there are no Collective Bargaining Agreements in place, the Entity has established alternative means to promote the involvement of Workers in industrial relations.
10.2a Child Labour	Conformance	The Entity has implemented a Child Labour Policy. Young Workers receive special protection under the Labour Standards Law and are not allowed to work in hazardous working conditions. The Entity has established processes to verify the age of the candidates through interviews and checking ID cards. There is no Child Labour or any young Workers in the Entity, and the youngest Worker on site is 25 years old. The Entity communicates with Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.
10.3a-c Forced Labour	Conformance	The Entity has established and implemented the Prevention of Involuntary Labour Procedure, and commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, Slavery and

CRITERION	RATING	COMMENT
		Human Trafficking. Worker and management interviews and document review confirmed that employees are not required to provide any form of deposit, Recruitment Fees or advances at any stage of the employment. There is no restriction on Workers' freedom of movement at the site or at on-site accommodation. Workers are free to leave the factory when not engaged in work. There are no foreign Migrant Workers at the Entity. The Entity does not provide any form of loan to Workers. No terms of Debt Bondage were identified in the labour contracts signed between the Entity and Workers, and no illegal deductions were identified in payslips. The Entity has disclosed a Modern Slavery Statement, available at: https://xnl.chinalco.com.cn/bdgs/bdgsagg
10.4a-c Non-Discrimination	Conformance	The Entity has implemented an anti-Discrimination, Harassment and Abuse Procedure that ensures equal opportunities, and it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. The Non-Discrimination Policy is included in employee training during onboarding and annual re-calibration. Worker interviews and results of the annual business conduct and conflict assessment confirmed the workplace has equal opportunities and is free of Discrimination.
10.5 Communication and engagement	Conformance	The Entity has implemented an Employee Complaints Management Procedure. There are regular meetings between the Trade Union and senior management, a grievance and complaints hotline and email, and operating procedures that ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented a corporate Policy that prohibits Harassment and Violence in the workplace. The Entity provides training on the Policy regarding the prevention of Harassment, and countering Harassment and Discrimination. The Entity has established an Ethics and Compliance Integrity Line that <u>is</u> available in all languages, and employees can anonymously report any case of Violence or Harassment. The ASI Policy – Environment, Governance, Social and Responsible Sourcing is available at: https://xnl.chinalco.com.cn/bdgs/bdgsagg
10.7a-c Remuneration	Conformance	The Entity's Remuneration payments are documented and promptly paid to all Workers by bank transfer on the 18 th of every month. Employees receive Remuneration for working Overtime, public holidays, rest days and night shifts. Payslips with information on wages, calculations and deductions such as taxes, are provided for all employees. Employees are paid wages higher than the fixed living wage in China.
10.8a-c Working Time	Conformance	The Entity has implemented an attendance and working hours system. As confirmed by Worker interviews and review of attendance records (20 sampled employees over a 12-month period), working hours are monitored and comply with Chinese Labour Law. Overtime is voluntary, and Workers can refuse to work Overtime. The total weekly hours do not exceed 60 hours, and at least one day of rest in a week is guaranteed.

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights through local information systems including electronic noticeboards, public bulletin boards located in every workshop, the employee manual, training, personal consultations and meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System and has a valid ISO 45001:2018 certificate. The Entity has established formal Policies for OH&S which are posted in the internal public areas. However, it was observed during the audit that some chemicals e.g., lubricating oil, did not have a corresponding Material Safety Data Sheet (MSDS).
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented an OH&S Management System and has a valid ISO 45001:2018 certificate. The Entity has established performance indicators, and a comparative analysis of performance with peer Businesses and leading practice is published in the Sustainability Report, available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established adequate and effective procedures on OH&S control, including Safety Committee meetings, a suggestion box, congress and irregular Worker interviews.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 March 2023	Initial Certification Audit – Full Certification