

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Chalco Shandong Advanced Material Co., Ltd

CERTIFICATE NUMBER  
**351**

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

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.**

DATE OF ISSUE  
**9 MAY 2024**

DATE OF EXPIRY  
**8 MAY 2027**

CERTIFIED SINCE  
**9 MAY 2024**

AUTHORISED BY

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

## Certification scope

Production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
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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](http://www.aluminium-stewardship.org)

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Chalco Shandong Advanced Material Co., Ltd
ENTITY NAME	Chalco Shandong Advanced Material Co., Ltd
CERTIFICATION SCOPE	Production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Alumina Refining</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	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>7 – 10 November 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>21 December 2023</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the Production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Alumina Refining</li></ul> <p>All relevant 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><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	9 May 2024 – 8 May 2027

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NEXT AUDIT TYPE                      Surveillance Audit

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NEXT AUDIT DATE                      9 November 2025

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CERTIFICATE NUMBER                      351

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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

Chalco Shandong Advanced Material Co., Ltd, a subsidiary of Aluminium Corporation of China Limited (Chalco, also known as CHINALCO), specialises in producing high-end Alumina Products. The Entity's main Products include 4A zeolite, pseudo-boehmite, and five other Alumina Products. These Products are primarily used as fillers and additives in industries such as everyday chemicals and glass manufacturing. The facility is located within the industrial park of Aluminium Corporation of China Limited in Zibo, Shandong Province, which was established in 1958.

The Entity's main production processes include raw material slurry preparation, clinker sintering, leaching, red mud separation and washing, liquor purification, evaporation, seeding, and Product packaging.

The Entity has a recently upgraded production line that produces 10,000 tonnes of PHS series pseudo-boehmite for hydrocracking per annum. Environmental approvals for the project have been received.

## 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	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	High	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The management process for identifying and assessing ASI-related Legal and other requirements is established and implemented. The compliance evaluation is conducted once a year, and the result is recorded.
1.2 Anti-Corruption	Conformance	<p>The Entity establishes the Policy on Anti-Corruption. The whistle-blowing channel, investigation process and discipline Procedure are established.</p> <p>The Entity identifies and assesses the risk to business ethics, identifies the position with high risks and establishes the associated control measures. The Anti-Corruption Policy is communicated to all stakeholders. No Corruption case has been reported or found in the past 3 years.</p>
1.3a-e Code of Conduct	Conformance	<p>As part of the Chalco Group, the Entity has implemented an Integrity and Compliance Manual covering environmental, social and governance principles. The Entity compiled and implemented a Code of Conduct based on the Group manual.</p> <p>The Code of Conduct shall be reviewed in the management review meeting or during major business changes or control gaps.</p> <p>The Integrity and Compliance Manual and Code of Conduct are published at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109064609.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109064609.pdf</a> and  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established and implemented the ASI Policies, which are consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Policies are approved by the General Manager, who demonstrates commitment to implement the Policies through the provision of resources.</p> <p>The ASI Policies are reviewed in the annual management review meeting or when there is a major change in the Business or a control gap is identified.</p> <p>The ASI Policies are disclosed at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108508377.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108508377.pdf</a></p>
2.2a-c Leadership	Conformance	A senior manager has been appointed as the Management Representative, and the responsibilities and authorities of the Management Representative and other management roles are defined, including leading communication of the Policies and providing the resources needed.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established, implemented and continually improved its Environment Management System, which is certified against ISO 14001:2015.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	A Social Management System has been established and implemented. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented a Policy (Supplier Code of Conduct), systems, Procedures and processes that conform to the responsible sourcing requirements. The Entity has conducted second-party due diligence audits at its major suppliers' sites.</p> <p>The Supplier Code of Conduct is disclosed at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108513669.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108513669.pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has established and implemented Procedures to identify and assess the risks on social, environmental, OH&amp;S and governance aspects and establish the relevant management plan to prevent, mitigate and, where necessary, remediate any Material impacts identified.</p> <p>The Entity has conducted an environmental and social Impact Assessment of its current Major Change project (10,000 tonne/yr PHS series of boehmite), and the environmental and social impact management plan has been established and implemented. Processes are in place to ensure the management plan is reviewed in the annual management review meeting or when a major change in the Business or a control gap exists.</p> <p>The Environmental and Social Impact Assessment and the latest version of the environmental and social impact management plan are disclosed at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108527218.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108527218.pdf</a>  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html</a></p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has established and implemented Procedures to identify and assess the Human Rights impact, including gender analysis, and establish the relevant management plan to prevent, mitigate and, where necessary, remediate any Material impacts identified.</p> <p>the Entity has conducted a Human Rights Impact Assessment of its current Major Change project, which addressed Indigenous Peoples and gender equality.</p> <p>Processes are in place to ensure the management plan is reviewed in the annual management review meeting or when a major change in the Business or a control gap exists.</p> <p>The Human Rights Impact Assessment and the latest active version of the environmental and social impact management plan is disclosed at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108571802.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108571802.pdf</a></p>
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 ISO 45001:2018 certificates and Emergency Response Plans are developed and implemented. The Entity has conducted an annual emergency response drill to assess the effectiveness of the emergency response plans and provides emergency response training to employees.

CRITERION	RATING	COMMENT
		<p>The Entity has committed to reassessing emergency management plans in the event of any change within the organisation that results in a modification of the nature and scale of emergency risks. Additionally, the emergency management plans will be reviewed upon identification of control deficiencies.</p> <p>The Entity's Emergency Plan is available at:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108546733.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108546733.pdf</a></p> <p>Further information is also available in the Corporate Social Responsibility, in the section 'ASI Certification Disclosure Materials'</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan to address emergency situations which may suspend or alter operations, which considers the Material adverse environmental, social and governance impacts and establishes the associated control measures. The Entity's ASI PS Management Manual accounts for the review of the Continuity and Resumption Plan.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Procedure for mergers and acquisitions, however, no such activity has occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a process for closure, decommissioning and divestment, however, no such case has occurred in the past three years.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity is a subsidiary of CHINALCO, which has published a 2022 Corporate Social Responsibility Report:  <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109612497.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109612497.pdf</a></p> <p>However, the report is very general and does not contain specific information on the Entity.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>As confirmed by the official websites of relevant government agencies and NGOs, the Entity did not have any Material fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law in 2022. The Entity publicly discloses this information at:</p> <p><a href="http://www.cninfo.com.cn/new/disclosure/detail?plate=sse&amp;orgId=9900002901&amp;stockCode=601600&amp;announcementId=1218149949&amp;announcementTime=2023-10-26">http://www.cninfo.com.cn/new/disclosure/detail?plate=sse&amp;orgId=9900002901&amp;stockCode=601600&amp;announcementId=1218149949&amp;announcementTime=2023-10-26</a></p>
3.3a-c Payments to Governments	Minor Non-Conformance	The CHINALCO Group has disclosed quarterly and annual financial reports on its website. However, the reports do not demonstrate any payment or tax information on the Entity.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The different levels of whistleblowing/complaint/grievance channels are established. For the CHINALCO Group, internal and external Stakeholders can access the hotline (86-10-82298446) or email address ( <a href="mailto:compliance-Chalco@Chalco.com.cn">compliance-Chalco@Chalco.com.cn</a> ). At the Entity, a separate hotline (0533-2944980) and email address ( <a href="mailto:2144603490@qq.com">2144603490@qq.com</a> ) is available to report misbehaviour or complaints. The Entity has clearly defined the process to record, report

CRITERION	RATING	COMMENT
		and handle complaints and grievances. There have been no complaints received to date.  The Entity has a process to ensure the Complaints Resolution Mechanism is reviewed in the annual management review meeting or when there is a major change in the Business, or a control gap identified. The Complaints Resolution Mechanism is disclosed at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108902992.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108902992.pdf</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its main Product series. The assessment was conducted in accordance with relevant provisions of international standards such as ISO 14040, ISO 14044 and T/CNIA 0076-2021. The LCA was performed using the eBalance software and utilised relevant data from the CLCD, ELCD and Ecoinvent databases. The Entity's LCA reports are publicly available on its official website.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has disclosed its cradle-to-gate LCA information for its main Products, which includes basic assumptions, system boundaries, and associated data. The LCA reports are available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/t20231218_119485.html</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has conducted an inventory of its Greenhouse Gas (GHG) emissions in accordance with ISO 14064 and has engaged a Third Party to verify the relevant GHG emissions data. According to the GHG Verification Report, the Entity's GHG emissions in 2022 amounted to 2,283,453 t CO <sub>2</sub> e. The information is publicly disclosed at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108970754.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108970754.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity - Started Production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
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	<p>The Entity has set a GHG emissions reduction target to control the carbon emission intensity of its Products to below 3.4 t CO<sub>2</sub>e /t by 2028. To achieve these emission reduction goals, the Entity has implemented or planned a series of technological and managerial measures to minimise energy consumption during production. The Energy Efficiency and Emission Reduction Action Plan is available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109057104.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109057104.pdf</a></p> <p>The Entity has committed to review progress against its GHG Emission Reduction Plan annually and publicly disclose updates and improvement measures.</p> <p>However, the Entity included an inappropriate benchmark as the reference standard for its mid-term GHG emission reduction targets. Furthermore, the reduction targets and plans lack quantifiable objectives and indicators.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a GHG Emissions Reduction Plan to define the management approaches to GHG emissions, with the main focus on energy management. Site observations, document review and interviews confirmed that, following the Plan-Do-Check-Action approach, the Entity manages its energy consumption. It monitors the Management System to achieve performance aligned with its GHG Emissions Reduction Plan.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has regularly monitored its Emissions to Air to ensure compliance with Applicable Laws and regulations. The Entity has disclosed its air pollutant emissions, available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109611818.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109611818.pdf</a></p> <p>The Entity has taken necessary measures to reduce exhaust gas emissions, and has plans to further reduce emissions, such as the clinker kiln CO governance project and clinker warehouse dust collection system renovation project. The Entity has committed to review and revise its management plan whenever any changes in the Business alters the primary risks associated with atmospheric pollutant emissions.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has disclosed its wastewater discharges, including types and quantities, through the Water Risk Impact Assessment and Pollution Discharge Permit Compliance Report, available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109987264.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109987264.pdf</a> and <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109978262.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109978262.pdf</a>.</p> <p>Currently, the Entity's primary wastewater discharge consists of domestic sewage, while all process-related wastewater is recycled, resulting in no industrial wastewater discharge. The discharge of domestic sewage constitutes only a negligible portion of the overall</p>

CRITERION	RATING	COMMENT
		<p>water consumption in the Facility. Therefore, the Entity does not require additional emission reduction plans.</p> <p>Furthermore, the Entity has established a Wastewater Management Program and committed to reviewing and revising the plan whenever there are significant risks that may impact water pollutant discharge or indications of an escalation in water pollution, particularly in the event of any changes at the Entity.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established a risk assessment and management Procedure, which identifies and evaluates the risks of Spills and Leakages, and implemented corresponding emergency response measures and plans. The Identification of Leakage Hazard Sources report and the Emergency Response Plan 'are available at:</p> <p><a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109965390.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109965390.pdf</a></p> <p>The Entity has conducted regular inspections to identify potential hazards related to Spills and Leakages and prepared a Safety and Environment Inspection Report. The Entity has committed to review the relevant management plans whenever any changes in the Business alters the substantial risks associated with Spills and Leakage, as well as when there are indications of control deficiencies.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has outlined the process for reporting Spills and Leakages in its environmental management Procedure and the Emergency Response Plans. There have been no recorded incidents of Spills in the past three years. The most recent versions of the Spills and Leakages risk assessment report and the Emergency Response Plan are available:</p> <p><a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109965390.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109965390.pdf</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is addressed in the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy and mitigates its Material impacts by re-using and recycling Wastes. The disposal of Hazardous Waste complies with Applicable Law. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity from its activities in 2022 is disclosed at:</p> <p><a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109979549.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109979549.pdf</a></p>
6.6a-g Bauxite Residue	Conformance	<p>The Bauxite Residue storage facility currently utilised by the Entity was established in 1998 and employs the dry method for the disposal and stacking of Bauxite Residue. The management of the Bauxite Residue storage facility falls under the responsibility of CHINALCO Shandong Mining Company, a subsidiary of the Entity's parent company. The Safety and Environmental Protection Department of CHINALCO Shandong Co., Ltd, along with government safety and environmental protection authorities, regularly supervises and inspects the storage facility to ensure its safety and environmental compliance. Over the past three years, there have been no significant incidents compromising the safety and environmental integrity of the Bauxite Residue disposal.</p> <p>All wastewater generated from the Bauxite Residue is collected and recycled. The site observations during the audit confirmed that there were no extensive areas of exposed Bauxite Residue. The dam of the</p>

CRITERION	RATING	COMMENT
		Bauxite Residue storage facility remains intact without any signs of leakage or collapse. The pipelines used for the transportation of the Bauxite Residue and recycled liquids are well-maintained, with no obvious damage.
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.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has undertaken environmental impact and water resource risk assessments and documented its water intake and usage by source and type. The risk assessment and water balance diagram area available at:</p> <p><a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109987264.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603109987264.pdf</a></p> <p>The risk assessment considered the surrounding water environment, water intake and discharge, as well as the effectiveness of existing management measures, and determined the Entity's water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The assessment of Biodiversity and Ecosystem Services risks and impacts have been incorporated into the EIA, which was conducted by a qualified third party and approved by the local environmental protection agency. Based on the EIA report and the results of the Biodiversity risk assessment, there are no biodiversity-sensitive areas within the Entity's Area of Influence. The Entity is located within an industrial zone planned by the local government and has an effective Environmental Management System. Therefore, the level of risk is considered low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks to and potential impacts on Biodiversity and Ecosystem Services have been assessed and documented as low. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks to and potential impacts on Biodiversity and Ecosystem Services 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 no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has implemented a management Policy and Procedures that are designed to prevent the introduction of invasive species. The

CRITERION	RATING	COMMENT
		potential risks associated with the introduction of such species through the Entity's operations and logistics activities have been identified and assessed to determine if these activities could significantly harm Biodiversity and Ecosystem Services. The Biodiversity assessment determined the risk of the Entity's activities introducing invasive species as low.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity's Management Manual has established its commitment to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity's Management Manual has established its commitment to protecting the environment. There are no Protected Areas in the Entity's Area of Influence.
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	<p>The Entity has implemented a Policy committed to respecting Human Rights, including Gender Equity, and communicated it to all employees. The Policy is available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108508377.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603108508377.pdf</a></p> <p>The Entity has established and implemented a Human Rights Due Diligence process and has mapped the Affected Populations and Organisations. The risks to Human Rights are identified and assessed, and the control plan for Human Rights impacts has been established and implemented. The annual management review meeting reviews the Human Rights Due Diligence process.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect the rights of women and a program including a special agreement on women Workers' rights signed between the Entity and the Trade Union to promote gender equity and women's empowerment in the whole employment process. No complaints have been received from women Workers. Interviewed women Workers confirmed that they knew their rights, and no negative feedback was received.</p> <p>The Entity has reviewed its program in the Effectiveness of Measures to Protect Gender Equality and Rights and Interests of Female Employees, available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110033917.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110033917.pdf</a>.</p>
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.

CRITERION	RATING	COMMENT
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.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has implemented a Procedure to identify cultural and religious sites and values and has conducted a risk assessment. There are no cultural or sacred heritage sites and values within the Entity's Area of Influence.
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 exist within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Changes or New Projects causing resettlements in the history of the Entity.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	The Entity has identified and assessed the risks and impacts on the legal and customary rights and interests of Affected Populations and Organisations and implemented a control plan to identify, prevent, monitor, mitigate and account for any significant impacts. The control plan is reviewed in the annual management review meeting, or following any major change in the Business or upon identification of a control gap. However, the latest version of the control plan has not been publicly disclosed.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Policy to commit to not using conflict minerals and implemented a Management System. Training has been provided for all relevant employees, and the Policy and requirements are communicated to suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment and requires suppliers to complete the Responsible Minerals Due Diligence Management forms to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs). The risk assessment report determined that there are no materials from CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The risk assessment report determined that there are no materials from CAHRAs and no red flags in the supply chain. The Entity maintains a business relationship with material suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Audit.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity has reported on the performance of its supply chain Due Diligence in its 2022 Progress Report, available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110043037.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110043037.pdf</a>
9.9 Security practice	Conformance	The responsibilities and authorities of security guards are limited to safeguarding property, vehicle management and visitor registration. Body searches are not permitted, and restrictions on the workers' movement are prohibited. Training is provided to security guards. No complaints regarding security activities have been received to date.
<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 it complies with Applicable Law in China regarding the Freedom of Association and Collective Bargaining. There is a Labour Union at the Entity with nine members.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	There is a Labour Union and a Collective Bargaining Agreement at the Entity. Employees in each department elect their representatives each year and, in December 2022, 54 Worker representatives were selected. The employee representatives are involved in Collective Bargaining and issues regarding the Workers' rights and wellbeing.
10.2a-c Child Labour	Conformance	Document review, site observations and Worker interviews confirmed that there is no Child Labour or young Workers at the Entity. The youngest Worker on the site was born in September 1998, and joined the Entity in November 2019.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy on the prohibition of Forced Labour, including Human Trafficking, and the Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking.</p> <p>Worker and management interviews, document review and site observations confirmed that the Entity neither engages in nor supports the use of Forced Labour, nor directly, nor engages in or supports Human Trafficking. Workers are hired directly by the Entity and do not pay any fees or deposits to secure employment. No loan is provided to Workers. Workers retain their own identity documents. The Entity respects the Workers' right to freedom of movement and no unreasonable restriction was observed. Workers can freely terminate their employment with prior notice.</p> <p>The Entity has disclosed its 2022 Modern Slavery Statement, available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110059695.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110059695.pdf</a>.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established a commitment to non-Discrimination. The Entity's recruitment advertisements, training and promotion opportunities and termination records indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The payment records demonstrate equal pay for the same work. Workers interviewed confirm they feel they are treated equal and, to date, no case of Discrimination has been reported.

CRITERION	RATING	COMMENT
		The Entity provides training courses on Discrimination to Promote a culture of non-Discrimination.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication mechanisms with the Workers and the Worker's representatives. The communication channels are announced to Workers and Workers can raise complaints and concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has a Policy prohibiting any form of Violence and Harassment. With Workers' participation, the Entity has identified and assessed the risks of Violence and Harassment and implemented control measures to prevent it from occurring. Training is provided to all Workers to inform the process of reporting cases of Violence or Harassment.. No case of Violence or Harassment has been reported or identified in the past three years.</p> <p>The Policy is reviewed in the annual management review meeting or when there is a major change in the Business or upon identification of a control gap. The Policy on Violence and Harassment is disclosed at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110077204.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110077204.pdf</a></p>
10.7a-d Remuneration	Conformance	<p>The Entity and Workers sign a labour contracts within a month of commencing employment at the Entity. The terms and conditions of the labour contract meet the labour contract law.</p> <p>The wage structure is clearly defined; and the basic wage is not less than the legal minimum wage. The total payment meets the Workers' basic needs. Overtime is paid in accordance with the legal requirements of 150% of the regular wage for Overtime on working days, 200% for weekends, and 300% on public holidays.</p> <p>The Entity makes wage payments on time and without delay. Paid leave is provided to all eligible Workers in compliance with the applicable legal requirements.</p>
10.8a-c Working Time	Conformance	Working hours at the Entity are recorded by a finger-scanning meter or facial recognition device. The regular working hours are 8 hours a day, five days a week, with a total of 40 hours a week. Working hours are monitored and controlled, and the monthly Overtime working hours do not exceed the legal monthly limit, and one day off a week is guaranteed.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through orientation training, providing an Employee Handbook, billboards on-site, and periodical communication.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established and implemented an Occupational Health and Safety (OH&amp;S) Management System that is ISO 45001:2018 certified and continually improved.</p> <p>Through on-site observations, document review, and interviews with management and Workers, it has been determined that the OH&amp;S Management System is effective.</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has conducted periodic reviews of its Occupational Health and Safety (OH&amp;S) Management System through various means, including monthly safety meetings, annual evaluation of legal compliance, annual internal audits, and management review meetings.</p> <p>Reviews are conducted upon any indication of a control gap to assess if potential corrective and/or preventive actions should be implemented. The Entity's OH&amp;S objectives and targets during 2022, as well as comparative analyses of performance with peer businesses and leading practices, is integrated into the performance of the CHINALCO Group. The report is available at: <a href="https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110085602.pdf">https://sdly.chinalco.com.cn/shzr/shzrbg/202312/P020231218603110085602.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a system for Workers' consultation and participation in OH&amp;S matters. Workers are encouraged to report their concerns or provide advice on OH&amp;S issues individually or through a Worker representative. The management of the Entity responds to these concerns and advice.</p>

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 May 2024	Certification Audit - Full Certification