

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Henan Zhongfu High Precision Aluminium Products Co., Ltd

CERTIFICATE NUMBER

123

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SGS-CSTC
STANDARDS
TECHNICAL SERVICES

DATE OF ISSUE

1 APRIL 2024

DATE OF EXPIRY

30 MARCH 2027

CERTIFIED SINCE

1 APRIL 2021

AUTHORISED BY

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Aluminium Stewardship Initiative Ltd
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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

A high-end Aluminium product manufacturer including casting, hot rolling, cold rolling, finishing and packaging process, located in Yulian Industrial Park, Zhanjie Town, Gongyi City, Henan Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Henan Zhongfu High Precision Aluminium Products Co., Ltd
ENTITY NAME	Henan Zhongfu High Precision Aluminium Products Co., Ltd
CERTIFICATION SCOPE	A high-end Aluminium product manufacturer including casting, hot rolling, cold rolling, finishing and packaging process, located in Yulian Industrial Park, Zhanjie Town, Gongyi City, Henan Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (21 – 23 January 2021)Surveillance Audit (3 – 4 August 2022)Re-Certification Audit and Scope Change (18 – 22 March 2024)
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">21 – 23 January 2021 (Initial Certification Audit)3 – 4 August 2022 (Surveillance Audit)18 – 22 March 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">26 February 2021 (Initial Certification Audit)17 November 2022 (Surveillance Audit)13 April 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Certification Audit (21 – 23 January 2021)</u></p> <p>The Audit Scope included the manufacturing of aluminium products at the Henan Zhongfu High Precision Aluminium Products facility, located in Gongyi City, Henan Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation) <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (3 – 4 August 2022)

The Audit Scope included the manufacturing of aluminium products at the Henan Zhongfu High Precision Aluminium Products facility, located in Gongyi City, Henan Province, China.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (18 – 22 March 2024)

The Audit Scope included the manufacturing of aluminium products at the Henan Zhongfu High Precision Aluminium Products facility, located in Gongyi City, Henan Province, China.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME • Certification

AUDIT METHODOLOGY
DECLARATION The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the company's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 1 April 2024 – 30 March 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 30 September 2025

CERTIFICATE NUMBER 123



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

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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

Henan Zhongfu High Precision Aluminium Products Co., Ltd. (the 'Entity') is located in Yulian Industrial Park, Zhanjie Town, Gongyi City, Henan Province, Peoples Republic of China. It is a wholly-owned subsidiary of Henan Zhongfu Industrial Co., Ltd., and is the main unit of Henan Yulian Energy Group Co., Ltd for research, development and production of Aluminium alloy high-end materials. The Entity commenced operations in 2012 and relies on the 600,000 tonne high-performance Aluminium alloy special project of the Zhongfu Industry for production and operation. The company has a registered capital of 2 billion yuan and total assets of 6 billion yuan.

The Entity consists of a Casthouse, a hot rolling plant and cold rolling plant. The Casthouse produces Aluminium plate ingot for internal use only, with a capacity of 6000,000 tonnes. The hot rolling plant produces hot rolled coil for internal use only. The cold rolling plant produces Aluminium strip with annual production of 570,000 tonnes. The main products are Aluminium can body stock, can end stock, can tab stock and Aluminium foil stock, used in the food, beverage and other product sectors.

There are over 810 employees at the Entity, and its key external stakeholders include the local government and nearby residents in the Zhangjie Town government and residential area. The Entity is certified against numerous standards, including ISO 9001 quality management system, ISO 45001 occupational health and safety management system, ISO 14001 environmental management system, ISO 50001 energy management system, IATF 16949 automotive board management system, and FSSC 22000 food safety management system.

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	Low	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain awareness of and ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established a management Procedure to address Corruption. Employees are provided training and those in high-risk positions sign an anti-Corruption commitment. Risk assessments have been performed to evaluate the risks of Corruption and Bribery. The Entity has established a reporting hotline for whistleblowing.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct, which includes principles relevant to environmental, social and governance performance, and has been signed off by senior management: http://www.zfsy.com.cn/uploadFiles/files/20240316162149.pdf</p> <p>The Entity's ASI Management Manual addresses the requirements to review the Code of Conduct. Internal audits and management reviews are conducted annually to ensure the normal and effective operation of the Entity's system.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established and implemented an Environmental, Social, and Governance (ESG) Policy, which addresses environmental, occupational health and safety, ASI performance and energy. The General Manager has approved the Policy, which is reviewed every three years. The ESG Policy has been internally communicated via training and is displayed on the notice board. The ESG Policy is available at: http://www.zfsy.com.cn/uploadFiles/files/20220803164152.pdf</p>
2.2a-c Leadership	Conformance	The Entity has nominated the Vice General Manager as the Management Representative, with the overall responsibility and authority for ensuring Conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has developed and implemented an integrated Management System. The Entity has obtained ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented an integrated Management System. It has obtained ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISO 50001 certification. The SA8000:2014 management manual has been established and implemented to manage risks with respect to Human Rights and Labour Rights.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a responsible sourcing Policy that addresses environmental, social and governance issues. The Responsible Purchasing Policy is publicly disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240316162225.pdf</p>

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities since the Entity joined ASI. Nonetheless, the Entity has implemented an environmental and social management plan, available at: http://www.zfsy.com.cn/uploadFiles/files/20240326083146.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. Nonetheless, the Entity has developed a procedure to identify and assess Human Rights risks and the Human Rights Impact Assessment Report is disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240316162319.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans, which are registered with the local authority. Emergency drills are undertaken in accordance with the Plan and the effectiveness is evaluated. The Environmental Response Plan and Safety Response Plan are disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240319101536.pdf and http://www.zfsy.com.cn/uploadFiles/files/20240319101330.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established and implemented a Suspended Operations Management Regulation and Business Resilience Plan. The Entity's Management Manual addresses the requirements for review. There have been no changes to the Business or control gaps identified.
2.9a-b 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.
2.10a-b 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.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared a 2023 Sustainability Report, which is disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240326082459.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has not received any significant fines, judgements, penalties and non-monetary sanctions for failure to comply with Applicable Law. For details, pls refer to https://www.creditchina.gov.cn/xinyongxinxiangqing/xyDetail.html?searchState=1&entityType=1&keyword=%E6%B2%B3%E5%8D%97%E4%B8%AD%E5%AD%9A%E9%AB%98%E7%B2%BE%E9%93%9D%E6%9D%90%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8&uuid=034117543b35bdf86bca225d70b94d9&tyshxdm=91410000MA459CJ87U
3.3a-c Payments to Governments	Conformance	The Entity only makes payments to Governments on a legal and/or contractual basis. As a listed company, the Entity's financial statements are audited by a third party. The Entity discloses its payments and donations at:

CRITERION	RATING	COMMENT
		http://www.zfsy.com.cn/uploadFiles/files/20240326082806.pdf and http://www.zfsy.com.cn/uploadFiles/files/20240316162348.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible, transparent, understandable and culturally sensitive Complaints Resolution Mechanism that is adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. The Entity's ASI Management Manual addresses the requirement for review. To date, no complaints have been received from Stakeholders and employees' grievances have been received and addressed. The Complaints Resolution Mechanism is available at:</p> <p>http://www.zfsy.com.cn/uploadFiles/files/20240316162251.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has conducted a Life Cycle Assessment (LCA) on Aluminium plate and strip products of the entire industrial chain, available at: http://www.zfsy.com.cn/uploadFiles/files/20240326082648.pdf</p> <p>However, the LCA report is incomplete and does not address a 'cradle-to-gate' approach nor the emissions and environmental impacts of bauxite and anode production. Additionally, the LCA data is not in accordance with the relevant ISO standards.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's LCA report is disclosed on the website, available at: http://www.zfsy.com.cn/uploadFiles/files/20240408161035.pdf</p>
4.2 Product Design	Conformance	<p>The Entity has established a Product Design Procedure , which specifies the sustainability objectives in the design and development process for Products to enhance Circular Economy outcomes. Recent improvements have included the reuse of waste, integration of a rolling oilregeneration system and optimisation of the rolling process to reduce electricity consumption.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity targets and utilises all its Process Scrap in the Aluminium re-melting process. A Procedure has been established for the of separation and recycling of Aluminium Process Scrap.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has established and implemented a recycling strategy, with recycling plan for 2024 to 2030. It has defined targets and detailed measures to collect Pre-Consumer and Post-Consumer Scrap. The Entity's Waste Recycling Strategy is disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240326082420.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Minor Non-Conformance	<p>The Entity has signed waste collection and recycling contracts with Aluminium waste collection companies.</p> <p>However, the Entity has not fully engaged with local, regional or national collection and recycling systems to support recycling system efforts to increase recycling rates for their Products containing Aluminium.</p>

5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has evaluated its energy use and Greenhouse Gas (GHG) emissions. The Entity's 2023 GHG Inventory Report is disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240413100431.pdf</p> <p>However, the GHG emissions report does not meet all requirements and the information presented is insufficient, including the carbon footprint information on upstream Aluminium ingots and the emission factors applied. Additionally, the GHG emission report has not been independently verified by third party.</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	<p>The Entity has published time-bound GHG emissions reduction targets in its Carbon Neutrality Action Plan, which outlines key actions to reduce Scope 1, 2 and 3 GHG emissions by 2050: http://www.zfsy.com.cn/uploadFiles/files/20240318080507.pdf</p> <p>However, the GHG Emissions Reduction Pathway does not align with a 1.5°C warming scenario and the actions lack of diversity in achieving the targets.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established the Greenhouse Assessment Management System, Greenhouse Inventory Management Regulation and Carbon Emissions Management Regulation to achieve performance aligned to the GHG Emissions Reduction Plan and the associated targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has quantified and reported Emissions to Air that have adverse effects on humans or the environment. The Report on Air Pollutants and Water Pollutants is available at: http://www.zfsy.com.cn/uploadFiles/files/20240318080653.pdf</p> <p>Air emission reduction targets have been established and an action plan implemented to achieve the targets, available at: http://www.zfsy.com.cn/uploadFiles/files/20240326083122.pdf</p> <p>The Entity has installed emission purification facilities according to its Environmental Impact Assessment (EIA) report to minimise adverse impacts.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity's Discharges to Water are controlled through use of water pollutant treatment facilities and regular monitoring is undertaken to ensure Compliance with local legal discharge limits. The Entity has quantified and reported Discharges to Water that have adverse effects on humans or the environment in the Report on Air Pollutants and Water Pollutants is available at: http://www.zfsy.com.cn/uploadFiles/files/20240318080653.pdf</p>

CRITERION	RATING	COMMENT
		The implementation plan is reviewed annually. There has been no exceedance of the discharge limits.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an assessment of major risk areas of operations where Spills and Leakages may contaminate air, water and/or soil. The Leakage Risk Identification and Evaluation Report is available at: http://www.zfsy.com.cn/uploadFiles/files/20240318080830.pdf</p> <p>The Entity has established the 'Emergency Response Plan to Environmental Incident' Procedure to prevent, detect and remediate Spills and Leakages. The action plan is reviewed annually or following any Spill or Leakage event. To date, there has not been any Spill or Leakage.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has prepared an Emergency Response Plan for Environmental Incidents, which specifies that in the event of leakage, the responsible persons of surrounding villages must be notified and informed of the potential impact of Spills and Leakages. The Leakage Risk Identification and Evaluation Report confirmed there was no leakage at the Entity in 2023: http://www.zfsy.com.cn/uploadFiles/files/20240318080830.pdf</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has quantified the volume and the disposal method of its Hazardous and Non-Hazardous Waste and evaluated the Material impacts to human well-being and the environment of the Wastes. The Waste Disposal Disclosure Report is publicly disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240318080441.pdf</p> <p>However, whilst the Entity has developed a waste management regulation, it has not developed a waste management strategy designed in accordance with the Waste Mitigation Hierarchy.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has established and implemented a Dross Management Procedure. Observations during the Audit confirmed that Dross residues are properly labelled and stored in a dedicated warehouse with appropriate treatment to prevent the release of Dross and leachate to the environment. Dross and Dross residues are commissioned to a licensed company for reuse and Dross is not landfilled.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified, documented and publicly disclosed its water withdrawal and use by source and type on an annual basis. to the Water Resources and Water Use Report is available at: http://www.zfsy.com.cn/uploadFiles/files/20240318080112.pdf</p> <p>The Water Resources Risk Assessment Report confirms that the Entity's water-related risks are low: http://www.zfsy.com.cn/uploadFiles/files/20240318080744.pdf</p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	Whilst the Entity's water-related risk is low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The assessment determined that the Biodiversity and Ecosystem Services risk is low. The Entity has developed a plan to manage these risks with control measures presented in its Biodiversity Assessment Report, pages 7-9: http://www.zfsy.com.cn/uploadFiles/files/20240318080718.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment (EIA) determined that the Entity is not located in a key ecological area and that the risk to Biodiversity is low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the EIA determined that the risk to Biodiversity and Ecosystem Services is low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the EIA determined that the risk to Biodiversity and Ecosystem Services is low and no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has assessed the risk of Alien Species in the Biodiversity Assessment Report and proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. No Alien Species have been introduced.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Conformance	The Entity has established a Human Rights Policy and Human Rights Due Diligence Procedure to respect Human Rights and identify any potential impacts from the Entity's operations and business relationships. The Entity has identified the Affected Populations and Organisations and a Complaints Resolution Mechanism is in place and available for Stakeholders. Employees are provided training on the Policy, and it is communicated via on-site display. The Policy and Procedure are reviewed every three years and a process in place for review upon any changes of control

CRITERION	RATING	COMMENT
		deficiencies. The Human Rights Policy is available at: http://www.zfsy.com.cn/uploadFiles/files/20240326082829.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a Women's Rights Management Procedure to implement the Entity's gender equality and women's rights program. The program is communicated to internal and external Stakeholders by training, the website and on-site display. Women's rights and interests are respected. The Entity has identified the legal rights for women and implemented control measures to ensure these requirements are met. The effectiveness of the measures implemented to promote gender equity are considered annually, and disclosed at: http://www.zfsy.com.cn/uploadFiles/files/20240318075513.pdf
9.3a-l Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories and resources in the Entity's Area of Influence. Nonetheless, the Entity respects for the rights and interests of Indigenous Peoples and has publicly disclosed the latest versions of the management Procedure for Indigenous Peoples: http://www.zfsy.com.cn/uploadFiles/files/20240408161237.pdf
9.4a Free, Prior, and Informed Consent (FPIC)-- New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories and resources in the Entity's Area of Influence.
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 or their lands, territories and resources in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage-- Identification	Conformance	The Entity has committed to protect cultural and sacred heritage sites and values. The Entity is located in an industrial park which has been planned and constructed by the local Government. There are no cultural and sacred heritage sites or values present at the industrial park.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the Entity's Area of Influence, nor are there nearby cultural and/or religious sites.
9.6a-i Displacement	Conformance	The Entity has established a Resettlements Management Procedure. The Entity is located in an industrial park which was planned and constructed by the local Government and no Resettlement was required, nor is any expected in the future.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented process to actively identify and address the primary concerns of Affected Populations and Organisations. To effectively respond to these concerns, the Entity has developed a range of plans, which are effectively implemented. The Entity's performance in executing these plans and actions is disclosed in the annual Sustainability Report at:

CRITERION	RATING	COMMENT
		http://www.zfsy.com.cn/uploadFiles/files/20240701200946.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The entity has established and implemented "CAHRA Due Diligence Management Procedure" to define the responsibility, the procedure of due diligence (DD). DD was implemented and recorded in "Conflict Mineral Survey Form". Per DD, all suppliers are from China instead of from CAHRAs. No conflict Mineral policy has been established and disclosed. For details, pls refer to http://www.zfsy.com.cn/uploadFiles/files/20240731163445.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented the Conflict-Affected and High-Risk Areas (CAHRAs) Management Procedure, and a risk assessment has been conducted. The risk assessment determined that there is no risk of contributing to armed conflict or Human Rights violation in the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity sources recycled aluminium as well as primary aluminium, The Entity has implemented the Conflict-Affected and High-Risk Areas (CAHRAs) Management Procedure, and a risk assessment has been conducted.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices and risk assessment were reviewed as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has prepared and disclosed its supply chain Due Diligence report in official website at http://www.zfsy.com.cn/uploadFiles/files/20240413100404.pdf However, the due diligence report is incomplete.
9.9 Security practice	Conformance	The Entity has implemented security practices to respect Human Rights. This procedure requires security providers to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, there has been no security-related Human Rights violations.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it operates within the Applicable Law in China to respect the Workers' right to Freedom of Association and Collective Bargaining. In accordance with the Trade Union Law, the All-China Federation of Trade Unions is the sole legal organisation for Trade Unions, which along with its constituent Trade Union organisations, represent the interests of Workers and lawfully safeguards the legitimate rights and interests of Workers.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established the Freedom of Association Procedure, which addresses the Freedom of Association and right to Collective Bargaining. In accordance with the Trade Union Law, the All-China Federation of Trade Unions is the sole legal organisation for Trade Unions, which along with its constituent Trade Union organisations, represent the interests of Workers and lawfully safeguards the legitimate rights and interests of Workers. The Trade Union at the Entity was established in accordance with local Applicable Law and Workers have the right to join or not join the Trade Union. All employees are

CRITERION	RATING	COMMENT
		members of the Trade Union, and Worker representatives are freely selected and act to represent the Workers' concerns with management. A special Collective Bargaining contract is in place.
10.2a-c Child Labour	Conformance	The Entity has established a Policy and Procedure that addresses the prohibition of Child Labour. There is no Child Labour or young Workers (16 to 18 years) at the Entity, the youngest Worker was 20 years of age. Document review during the Audit confirmed there was no Child Labour at the Entity.
10.3a-c Forced Labour	Conformance	The Entity has established Prohibition of Forced Labor Procedure and Policy on Modern Slavery and Human Trafficking, which strictly prohibits Forced Labour, including Human Trafficking and modern slavery. This policy applies to the Entity and its suppliers, and emphasizes the importance of compliance with the prohibition of Forced Labour, slavery, and Human Trafficking. Per worker interview and document review, there are no instances of illegal wage deduction, Debt Bondage, paying off a debt, or any other form of Forced Labour at the Entity. Information on the Policy and its implementation is available at: http://www.zfsy.com.cn/uploadFiles/files/20240318075421.pdf and showed in the ESG report via http://www.zfsy.com.cn/uploadFiles/files/20240326082459.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and has established an Anti-Discrimination Management Procedure to address Discrimination and outlined expectations in the Employee Handbook. The Entity has established performance evaluation measures for the assessment of equitable rates of pay. Worker interviews confirmed that employees are aware of the Entity's anti-Discrimination culture. No case of Discrimination has been recorded at the Entity.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication with the Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures are in compliance with legal requirements. The Entity has implemented the Human Rights Policy and the Harassment and Abuse Prevention Procedure to prohibit Violence and establishes the means to prevent Violence and Harassment and the Complaints Mechanism to respond to any related grievances. The Human Rights Policy is available at: http://www.zfsy.com.cn/uploadFiles/files/20240326082829.pdf Worker interviews confirmed there was no Violence and Harassment experienced at the Entity.
10.7a-d Remuneration	Conformance	The wage structure is clearly defined and the basic wage is above the legal minimum wage. The total payment meets the Workers' basic needs; and all Workers are enrolled in the mandatory social insurance scheme. The Entity has a Salary Management Procedure that addresses the payment of salaries monthly and in legal tender with full documentation. Confirmation was received by employees across different departments, and a sample of bank transfer records were reviewed during the Audit.

CRITERION	RATING	COMMENT
10.8a-c Working Time	Conformance	The Entity has implemented a Procedure that defines the requirements for working hours, and to address the requirements for the Entity's three-shift work system. Worker interviews and review of employee attendance records confirmed that employees have at least one day off in every seven and the workday is 8 hours on average over a six-month period.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established Policies and informed employees of their right to Freedom of Association and Collective Bargaining through training, email communications, notices and regular meetings. The Entity has implemented the Right to Free Joining Trade Unions and Collective Bargaining Management Procedure.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	The Entity's OH&S Management System is ISO 45001:2018 certified and is externally reviewed every three years. Internal audits are undertaken annually and processes are in place to additionally review as required. The Entity has established leading and lagging indicators and has disclosed a comparative analysis of its performance against the industry performance and leading practices: http://www.zfsy.com.cn/uploadFiles/files/20240408161210.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an ISO 45001:2018 OH&S Management System. The Entity has provided Workers with a mechanism to raise, discuss and participate in the resolution of OH&S issues with management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 April 2021	Initial Certification Audit – Full Certification
1	9 December 2022	Surveillance Audit
2	30 July 2024	Re-Certification Audit and Scope Change – Full Certification