

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# SHANDONG NANSHAN ALUMINUM CO., LTD.

CERTIFICATE  
NUMBER

53

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

9 DECEMBER 2022

DATE OF EXPIRY

8 DECEMBER 2025

CERTIFIED SINCE

9 DECEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

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

CERTIFICATION SCOPE

Headquarter functions at: Shandong Nanshan Aluminum Co., Ltd. in Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China and the following sites with associated facilities:

Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China:

- (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).
- (2). Shandong Nanshan Aluminum Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).
- (3). Shandong Nanshan Aluminum Co., Ltd. (450,000 t/a aluminum alloy slab production line).
- (4). Plate Company of Shandong Nanshan Aluminum Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China:

- (1). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).
- (2). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).
- (3). Yantai Donghai Aluminum Foil Co., Ltd. (40,000 t/a high precision aluminum and aluminum foil production line).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Shandong Nanshan Aluminium Co., Ltd.
ENTITY NAME	Shandong Nanshan Aluminium Co., Ltd.
CERTIFICATION SCOPE	<p>Headquarter functions at: Shandong Nanshan Aluminum Co., Ltd. in Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China and the following sites with associated facilities:</p> <p>Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China:</p> <ul style="list-style-type: none"><li>(1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).</li><li>(2). Shandong Nanshan Aluminum Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).</li><li>(3). Shandong Nanshan Aluminum Co., Ltd. (450,000 t/a aluminum alloy slab production line).</li><li>(4). Plate Company of Shandong Nanshan Aluminum Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).</li></ul> <p>Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China:</p> <ul style="list-style-type: none"><li>(1). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).</li><li>(2). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).</li><li>(3). Yantai Donghai Aluminum Foil Co., Ltd. (40,000 t/a high precision aluminum and aluminum foil production line).</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Alumina Refining</li><li>Aluminium Smelting</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (23 – 28 September 2019)</li><li>Surveillance Audit (27 – 31 December 2021)</li></ul>

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- Re-Certification Audit and Scope Change (7 – 11 November 2022)
  - Surveillance Audit (26 – 30 August 2024)
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AUDIT FIRM DNV Business Assurance Services UK Ltd.

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- AUDIT DATE
- 23 – 28 September 2019 (Initial Certification Audit)
  - 27 – 31 December 2021 (Surveillance Audit)
  - 7 – 11 November 2022 (Re-Certification Audit and Scope Change)
  - 26 – 30 August 2024 (Surveillance Audit)
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- AUDIT REPORT SUBMISSION
- 24 October 2019 (Initial Certification Audit)
  - 25 April 2022 (Surveillance Audit)
  - 28 April 2023 (Re-Certification Audit and Scope Change)
  - 11 October 2024 (Surveillance Audit)
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AUDIT SCOPE Initial Certification Audit (23 – 28 September 2019)  
Alumina Refining, Aluminium Smelting, Aluminium Re-melting/Refining, Casthouses, Semi-Fabrication processes managed by headquarters (China). Headquarter: Shandong Nanshan Aluminium Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the audit scope:

Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

- (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).
- (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).
- (3). Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line).
- (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

- (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).
- (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

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### Surveillance Audit (27 – 31 December 2021)

The audit scope included Headquarter functions at Headquarters: Shandong Nanshan Co., Ltd. (China) and the following sites/facilities:

Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

- (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).
- (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).
- (3). Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line).
- (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:

- (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).
- (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

### Re-Certification Audit and Scope Change (7 – 11 November 2022)

The audit scope included the Headquarters' management functions, Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I), Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV), Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line), Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line), Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line), Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line), and Yantai Donghai Aluminum Foil Co., Ltd. (40,000 t/a high precision aluminum and aluminum foil production line).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- 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.

Surveillance Audit (26 – 30 August 2024)

The audit scope included the Headquarters' management functions, Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I), Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV), Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line), Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line), Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line), Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line), and Yantai Donghai Aluminum Foil Co., Ltd. (40,000 t/a high precision aluminum and aluminum foil production line).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- 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.

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 Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION  
PERIOD

9 December 2022 – 8 December 2025

NEXT AUDIT  
TYPE

Re-Certification Audit

NEXT AUDIT  
DUE DATE

8 December 2025

CERTIFICATE  
NUMBER

53

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has collected and identified the applicable legal and other requirements, and has conducted compliance evaluations annually. There have been no fines and/or requests for corrective action by government agencies or other Stakeholders. Further information on the legal compliance assessment is in the Entity's 2023 ESG Report:</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a></p> <p>Code of Conduct:</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>Policies and processes such as the 'Management Procedure of Anti-Corruption' to identify and prevent Corruption are implemented and personnel are trained in these processes. Training records are maintained. The Entity works against Corruption in all its forms, including extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has implemented a Policy for Labour and Business Ethics:</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a></p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Code which includes principles relevant to environmental, social and governance performance. All employees are provided with the training course on Code of Conduct. The Entity's ASI Management Manual stipulates that the Code of Conduct shall be reviewed in case of Material environmental, social and governance risk(s) caused by business changes or any indication of control gap and shall be reviewed at least once every five years.</p> <p>The Code of Conduct is published on the Entity's website:</p> <p><a href="http://www.600219.com.cn/detail.html?category_id=230">http://www.600219.com.cn/detail.html?category_id=230</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Systems, procedures and processes that conform to the environmental, social, and governance Policies requirement are developed and implemented. The Policies and procedures are reviewed and updated on a regular basis. The Policies are communicated internally and externally and are available on the company website:</p>

CRITERION	RATING	COMMENT
		<a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external Stakeholders by training, publishing on the website and posts on-site: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a>
2.2 Leadership	Conformance	A senior Management Representative has been nominated and a team including HR, EHS, Quality and Purchasing staff support the Management Representative to implement the ASI Performance Standard. The responsibility and authority of each department and key roles are defined, all relevant people have the good knowledge about sustainability issues.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System and to address Human Rights and Labour Rights, the Entity has established documented management procedures to implement the requirements of the ASI Performance Standard. For occupational health and safety, the Entity holds a valid ISO 45001:2018 certificate.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity has conducted second party due diligence audits at major next tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. The purchasing policies are part of the Entity's Policy for Labour and Business Ethics, accessible at: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a>
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are implemented by various departments at the Entity. Environment and Social Impact Assessment records are in place and the latest

CRITERION	RATING	COMMENT
		management plan has been established accordingly and publicly disclosed at: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170916_44889.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170916_44889.pdf</a>
2.6 Emergency Response Plan	Conformance	The Entity has established and implemented a Business Continuity and Resumption Plan covering fire, earthquake, hazardous chemical leak, extreme weather, labour shortage, and key equipment breakdown. The emergency response plans have been developed in collaboration with potentially affected Stakeholder groups including Communities, Workers and their representatives. The emergency response plans are registered with the relevant government agencies. Employees are provided with the relevant training courses and drills/exercises are conducted for fire/evacuation and chemical leak scenarios. The Emergency Response Plan is available at: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170916_44889.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170916_44889.pdf</a>
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions, but no such activity has happened since 2019.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment, but no such case has happened since 2019.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The 2023 Environment, Social and Governance (ESG) Report is published on the Entity's website: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a> and the Shanghai Stock Exchange: <a href="https://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-04-30/600219_20240430_COQS.pdf">https://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-04-30/600219_20240430_COQS.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity is a listed company on the stock market. The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2023 ESG Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is published in the Entity's Annual Report, accessible on the Shanghai Stock Exchange website:



CRITERION	RATING	COMMENT
		<a href="https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-02-29/600219_20240229_MM2F.pdf">https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-02-29/600219_20240229_MM2F.pdf</a>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	An internal and external Complaints Resolution Mechanism exists (e.g., whistleblower hotline, mail address, suggestion box). Further information is available in the Entity's Policy for Labour and Business Ethics: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170944_77774.pdf</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The environmental Life Cycle Assessment (LCA) has been conducted and documented.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate LCA information on its Aluminium Products.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The LCA is published on the website at: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170425_85231.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170425_85231.pdf</a> However, the evaluation results for 'global warming trends' and 'acidification trends', as well as the information relating to a 'sensitivity analysis' are not currently disclosed in the LCA Summary Report.
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end Product. <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170425_85231.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170425_85231.pdf</a>
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and, where generated targets 100% of Scrap for collection, recycling and/or re-use. The generated target for process scrap utilisation rate is 100%. The Entity separates Aluminium alloys and grades for recycling. Further information is available in the Entity's 2023 ESG Report, Life Cycle Management of Solid Waste, page 58: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys and grades for recycling. The generated target for process scrap utilisation rate is 100%. Further information is available

CRITERION	RATING	COMMENT
		in the Entity's 2023 ESG Report, page 58: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is communicating with its main customer to discuss how to improve the recycling rate of products at End of Life. The generated target for process scrap utilisation rate is 100%. Refer to the 2021 Sustainability Report, page 21-22: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Because there is not the complete local, regional or national collection and recycling systems for Aluminium scrap in China, the Entity is working with the customer to decide how to improve the recycling rate of Products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	Direct and Indirect (Scopes 1, 2 and 3) Greenhouse Gas (GHG) Emissions and energy use by source are tracked, calculated and documented annually. Reported GHG emissions data have been independently verified. Detailed information on the Entity's GHG emissions is available in the 2023 GHG Emissions Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170809_26589.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170809_26589.pdf</a> However, the Entity has inaccurately calculated the sea freight distances for raw materials transportation and omitted the emissions of the truck transportation process from the unloading port to the Entity's warehouse when calculating the GHG Indirect Emissions for Category 3 raw material transportation.
5.2 GHG emissions reductions	Conformance	The Entity has established a GHG Emissions reduction target and has plans to reduce its GHG Emissions across the whole process of 'Mine to Metal' from a 2021 baseline to meet the ASI Performance Standard emissions intensity targets for 2025 and 2030. The main strategy is to use renewable energy which includes solar panel installation, reduce unnecessary electricity consumption and increase the scrap recycle rate. Further information is available in the GHG Emissions Target Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240722/20240722103710_28643.pdf">http://www.600219.com.cn/static/admin/upload/file/20240722/20240722103710_28643.pdf</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has established and implemented a GHG Emissions Management System, which is developed in accordance with ISO 14001, ISO 50001 and ISO

CRITERION	RATING	COMMENT
		14064. The system covers aspects associated with GHG emissions and controls. Performance and achievement are reviewed periodically, and action plans to reduce emissions are developed and documented.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has defined and implemented a plan aimed at reducing Scope 1 and Scope 2 GHG Emissions to below 8 tonnes CO <sub>2</sub> e per metric tonne of Aluminium by 2030. Further information is available in the GHG Emissions Target Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240722/20240722103710_28643.pdf">http://www.600219.com.cn/static/admin/upload/file/20240722/20240722103710_28643.pdf</a>
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the Entity does not have plans for any new smelter lines to commence after 2020.

PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	The waste air generated in the operation is collected and treated before discharge. Emissions meet the local discharge limits. The Entity has implemented the air emission management plan with actions/controls to mitigate adverse impacts. The air emission status and improvement plan are reviewed and updated periodically within 24 months, and the Entity has publicly disclosed the air emission status and improvement plan annually. Previous years' reports are available on the Entity's website and the Pollutant Emissions and Reductions Report is accessible via: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf</a>
6.2 Discharges to Water	Conformance	Discharges to Water is addressed and managed within the Environmental Management System. The Entity has established water reduction targets and related plans to minimize adverse impacts. The monitor report of wastewater in 2022 shows major pollutants were monitored, monitoring results for these major pollutants meets the local legal discharge limits. The wastewater discharge and improvement plans are reviewed and updated periodically within 24 months, and the Entity has publicly disclosed the control and improvement plan annually. Previous years' reports are available on the Entity's website and the Pollutant Emissions and Reductions Report is accessible via: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf</a>

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of the areas of operations where Spills and Leakage may contaminate air, water and soil has been undertaken by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As per the ASI Management Manual, control measures and the emergency action plan for Spills/Leakage are reviewed in the ASI management meeting, held every 18 to 24 months. Reviews are also held after any Spill or Leakage event or after any changes to the Business that alter Spills and Leakages risk(s). The Entity has publicly disclosed the spill/leakage assessment result and the control plan in its annual Sustainability Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf">http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf</a> There has been no Spill or Leakage event since 2020.
6.4a Reporting of Spills (immediate disclosure)	Conformance	There has been no Spill or Leakage event since 2020. The Entity has established procedures for the investigation, handling and reporting of Spills and Leakages, including reporting to relevant Stakeholders. The Impact Assessments of Material Spills and Leakages and the remediation actions taken are published in the annual Sustainability Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf">http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf</a>
6.4b Reporting of Spills (regular reporting)	Conformance	The Impact Assessments of Material Spills and Leakages and the remediation actions taken are published in the annual Sustainability Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf">http://www.600219.com.cn/static/admin/upload/file/20230531/20230531102029_17879.pdf</a> There have been no Spills since 2020.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is addressed in the Environmental Management System. The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is in compliance with the legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed information related to waste generation and disposals in the Pollutant Emissions and Reductions Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170309_88233.pdf</a>
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has demonstrated that it had constructed Bauxite Residue storage facilities with adequate containment and protection of the environment. The Entity has adopted dry stacking technology for Bauxite

CRITERION	RATING	COMMENT
		<p>Residue and the technology to re-use the Bauxite Residue is tested by the Entity. Periodic monitoring and assessment of the Bauxite Residue reservoir is implemented. For further information refer to the ESG Report:</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a></p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>The Entity has implemented operational and inspection procedures to regular check and monitor the Bauxite Residue reservoir. An online monitoring system monitors for any displacement of the dam.</p>
6.6c Bauxite Residue (water discharge)	Conformance	<p>The Entity has controlled and neutralised the water discharged from the Bauxite Residue Storage area. There is no external discharge of water from the Bauxite Residue storage area, all wastewater is pumped back into the plant. Regular environmental monitoring of the Bauxite Residue reservoir for wastewater pollution is undertaken. For further information refer to the ESG Report:</p> <p><a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a></p>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	<p>The Entity does not discharge water or Bauxite Residue from the reservoir to marine and aquatic environments.</p>
6.6e Bauxite Residue (state of the art technologies)	Conformance	<p>The Entity has adopted dry-stacking technology for Bauxite Residue and the technology to re-use the bauxite residue is tested by the Entity.</p>
6.6f Bauxite Residue (remediation)	Conformance	<p>The Entity has established a management plan for the Bauxite Residue reservoir that addresses mitigation of the risk of future environmental contamination upon closure of the reservoir in the future.</p>
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	<p>The Entity has a designated Hazardous Waste warehouse where Spent Pot Lining (SPL) is stored in a manner that prevents the release of leachate (if generated) to the environment prior to shipment. SPL are packed into special bags and labelled as Hazardous Waste.</p>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	<p>According to China's environmental regulations, SPL is required to be disposed of as Hazardous Waste. The Entity optimises the recovery and recycling of carbon and refractory materials, such as optimising production processes, reducing consumption of raw materials and achieving efficiency gains.</p>

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	According to China's environmental regulations, SPL is required to be sent to a qualified supplier for disposal and disposed of as Hazardous Waste.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	According to China's environmental regulations, SPL is required to be sent to a qualified supplier for disposal and disposed of as Hazardous Waste. The Entity has regularly evaluated the hazardous waste disposal service provider on their ability and qualifications, and their search for alternatives to landfilling of treated SPL and/or stockpiling of SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	According to China's environmental regulations, SPL is required to be sent to a qualified supplier for disposal. SPL is not discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Aluminium taken from the Dross pressing is recycled in the Entity's melting furnaces. The remaining part is sold to external Dross processors for further extraction of Aluminium, which can be used to produce Aluminium alloying ingots.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the Dross pressing is recycled in the Entity's melting furnaces. The remaining part is sold to external Dross processors for further extraction of Aluminium, which can be used to produce Aluminium alloying ingots.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable as there is no Dross residue sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water source is the municipal water supply and usage is tracked and documented. The legally required 'Permit for Water Discharge into Public Drainage System' has been granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments, which has considered the Entity's industrial park location, nearby lands and waterways in their Area of Influence. Due to the nature of the product and production processes, and that most of the Entity's sites have closed loop water management systems, the level of water-related risk was found to be low.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there were no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	Water usage and water-related risks are published in the Water Risk Assessment Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170633_44942.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170633_44942.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Biodiversity assessment has been addressed as part of the Entity's Environmental Management System. The risk and potential impacts on Biodiversity by the operation of the Entity within the Entity's industrial park, include nearby lands and waterways, was assessed as low. The assessment involved qualified third parties and the report was approved by the local Environmental Protection Bureau (EPB). Further information is available in the Biodiversity Risk Assessment Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170459_37493.pdf">http://www.600219.com.cn/static/admin/upload/file/20240530/20240530170459_37493.pdf</a>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant Biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant Biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the outcome of the biodiversity risk assessment did not identify significant Biodiversity impacts.
8.3 Alien Species	Conformance	The main carrier medium (wooden pallets) is processed in a way to avoid the introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity's ASI Policy states the Entity's commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights. The Due Diligence process is established, which includes the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to Stakeholders. A remediation process for any adverse Human Rights impact has been established. No major impact has been reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected by the Entity. The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Entity has implemented the Equal Employment Opportunity Policy, which is communicated to all employees.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented a procedure to identify cultural and religious sites, and conduct a risk assessment to reduce the impact on these sites. There is a Buddha statue approximately 10 kilometres from the Nanshan Industry Zone and a Buddha temple 7 kilometres from the Donghai Industry Zone. The outcomes of the risk assessment and the feedback from the local religious affair's bureau, did not identify any impacts on the two sites. The Buddha statue, Buddha temple and the neighbouring resident communities are identified as within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity has established a procedure on resettlement. However, this Criterion is not applicable as there has been no resettlement or displacement by the Entity.



CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has established a procedure on resettlement. However, this Criterion is not applicable as there has been no resettlement or displacement by the Entity.
9.7a Local Communities (rights and interests)	Conformance	Based on the results of the Human Rights Due Diligence and a general risk assessment, undertaken to address the rights and interest of Local Communities, environment pollution was the only identified adverse impact on Local Communities. Plans have been implemented to mitigate adverse impacts. The Entity is active in community engagement at all their sites and at a corporate level. Through annual profits share, the Entity initiates projects that have a positive impact on the communities. The Entity provides charitable donations for facilities such as hospital, school, old people centre, sports centre. For further information refer to the 2023 ESG Report: <a href="http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf">http://www.600219.com.cn/static/admin/upload/file/20240607/20240607155209_70152.pdf</a>
9.7b Local Communities (impacts)	Conformance	The Entity has identified and assessed the impacts on the Local Communities. The control measures for the identified impact on Local Communities are established and implemented. No complaint from the Local Communities has been received. The Entity has a good relationship with Local Communities and actively engages with the community.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests. The Entity is active in community engagement at all their sites and at a corporate level. Through annual profits share, the Entity initiates projects that provides a positive impact to the communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not use conflict minerals, and communicates this through the Aluminium value chain. In accordance with the Due Diligence report, no materials are from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity commits, in its involvement with public and private security providers, to respect Human Rights in line with the ASI Performance Standard and good practices. The service agreement between the Entity and the security company and labour contracts of security workers also clearly defines the primary role of security workers which is to protect people, property and or assets and to respect Human Rights.

CRITERION	RATING	COMMENT
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China and respects the Workers' rights to Freedom of Association and Collective Bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China and respects the Workers' rights to Freedom of Association and Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There are laws that restrict Freedom of Association and Collective Bargaining in China. However, the Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining. Workers' representatives can deal with the Workers' concerns with management on behalf of Workers. There are 38 elected Worker representatives including 10 women.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in China. There is no Child Labour or young Workers (16 to 18 years) in the Entity. The Entity has a policy prohibiting Child Labour. The age of candidates is verified by checking identification cards and during interview.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in China. The Entity commits itself, and expects its suppliers, to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, Slavery and Human Trafficking. The Entity does not use nor support the use of Forced Labour and respects the Applicable Law, where national regulation restricts Forced Labour and Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are hired directly. Workers are not required to provide any form of deposit; Recruitment Fee or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in Forced Labour. There are no foreign Migrant Workers in the Entity, all Workers are Chinese.

CRITERION	RATING	COMMENT
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour. The Entity does not provide loans to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of original documents of Workers, only copies are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of employment complies with the Labour Contract Law: 30 days in advance or three days in the period of probation.
10.4 Non-Discrimination	Conformance	The Entity is committed to anti-Discrimination. A Policy banning Discrimination is established and implemented by the Entity. Recruitment advertisement and the training plan indicate there is no Discrimination in hiring or providing training opportunities for Workers. The interviewed women Workers confirm that they feel equal with male workers in salary and promotions, are not requested to do pregnancy tests, and there is no discrimination due to maternity leave. All interviewed Workers confirm there are no complaints on discrimination and feel equal within the company, e.g., equal pay for the same work.
10.5 Communication and engagement	Conformance	There are regular meetings between Workers' representatives and the senior management. The Entity has implemented operating procedures to 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. An anonymous grievance and complaints hotline is available to Workers.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are in compliance with legal requirements, which require the confirmation of involved Worker. The Entity does not engage in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The wage structure at the Entity is clearly defined, and the basic wage is above the legal minimum wage. The total remuneration meets the Workers' basic need. All Workers are enrolled in the mandatory social insurance scheme.

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	All wage payments are documented and timely paid to all Workers by bank transfer between the 25th to 30th of the following month.
10.8 Working Time	Conformance	Working hours at the Entity are recorded manually. Working hours are monitored and comply with China labour laws.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Occupational Health and Safety (OH&S) Policy is implemented, reviewed periodically and communicated with Stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to Workers and Visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training to understand the workplace hazards, OH&S risks and actions determined that are relevant to them. Workers understand their right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has a system of Workers' consultation and participation in health and safety. Workers' representatives participate at the monthly health and safety meeting and management responds the concerns and advice on OH&S issues from Workers.
11.4 OH&S performance	Conformance	Occupational Health and Safety (OH&S) targets and improvements are established and documented in the Entity's OH&S program. The implementation plans are established and implemented.

## **Document Control and Version History**

Revision	Date	Notes
0	9 December 2019	Issued (Full Certification)
1	16 July 2020	Hyperlinks updated for criteria 5.1 and 5.3
2	3 June 2022	Surveillance Audit
3	24 May 2023	Re-Certification Audit and Scope Change – Full Certification. Scope Change to include Yantai Donghai Aluminum Foil Co., Ltd. (40,000 t/a high precision aluminum and aluminum foil production line), China as a transfer from Certificate 17 (certification period validity of 29 January 2019 – 28 January 2025), and the Supply Chain Activity 'Material Conversion (Production and Transformation)'. .
4	31 October 2024	Surveillance Audit