

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Guangyuan Zhongfu Technology Co., LTD

CERTIFICATE NUMBER

390

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SGS-CSTC
STANDARDS
TECHNICAL
SERVICES

DATE OF ISSUE

12 NOVEMBER 2024

DATE OF EXPIRY

11 NOVEMBER 2027

CERTIFIED SINCE

12 NOVEMBER 2024

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

Manufacture of Aluminium alloy
plate ingots at Guangyuan Zhongfu
Technology Co., LTD located in
Sichuan, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Guangyuan Zhongfu Technology Co., LTD
ENTITY NAME	Guangyuan Zhongfu Technology Co., LTD
CERTIFICATION SCOPE	Manufacture of Aluminium alloy plate ingots at Guangyuan Zhongfu Technology Co., LTD located in Sichuan, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">17 – 19 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">22 August 2024
AUDIT SCOPE	<p>The Audit Scope covered the manufacturing Aluminium alloy plate ingots activities at Guangyuan Zhongfu Technology Co., LTD, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	12 November 2024 - 11 November 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 12 May 2026

CERTIFICATE NUMBER 390



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

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Guangyuan Zhongfu Technology Co., Ltd. ('the Entity') was established in March 2019, with a registered address in Yuanjiaba Park, Guangyuan Economic and Technological Development Zone. It mainly produces three series of Aluminum alloy flat ingots. primary production processes involve remelting and Casting, with a capacity of 150,000 tonnes per annum. The current actual output is approximately 110,000 tonnes per annum. The products are mainly supplied to Henan Zhongfu High Precision Aluminum Co., LTD., an internal company of the Group where they are further processed and widely used for 'fast-moving' consumer goods packaging such as cans, aseptic cartons, flexible packaging consumer electronics and for automotive light weighting.

The factory is situated in Yuanjiaba Park, in the Guangyuan Economic and Technological Development Zone. There are no sensitive areas nearby, such as residential areas, schools, scenic spots, or drinking water sources. The main building consists of a single factory building and an office area. Inside the factory, there are melting furnaces, insulation furnaces, furnace refining equipment, electromagnetic stirring equipment, sawing machines, milling machines, and wastewater treatment systems. Additionally, the workshop has a semi-finished products transfer area and a finished products warehouse. The factory also has a comprehensive wastewater treatment station, Hazardous Waste warehouse, and general solid waste warehouse. There are staff lounges and changing rooms on site for the employees' convenience. Parking lots, staff restaurants, and video surveillance on the factory's boundary protection fence are also provided. A living area with supermarkets, medical facilities, restaurants, and sports facilities have been established around the factory to meet the needs of employees and their families.

The Entity currently employs 67 persons, and its main Stakeholders include shareholders, customers, partners, downstream supply chains, and relevant government departments (such as tax authorities). The Entity's continued growth provides employment opportunities for the surrounding area.

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	Low	MEDIUM
RISKS	Low	Medium	Low	LOW
PERFORMANCE	Medium	Medium	Low	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a Laws and Regulations Management Procedure, which prescribes responsibilities and the method, timing and frequency of identifying and evaluating compliance with laws and regulations applicable to the environment, society and governance and forming a written compliance evaluation report.</p> <p>The Entity should evaluate their compliance with these requirements on an annual basis. However, the compliance evaluation process does not currently include laws and regulations relating to social responsibility.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has identified the high-risk position of commercial Bribery and has established an anti-Corruption Management Procedure, which prescribes the prohibition of Bribery in all business practices and transactions.</p> <p>The Responsible Procurement Policy includes anti-Corruption, and is available at: https://www.innovationmetal.com/d/file/p/2024/04-02/c2c5dfac5f8bef18b31fec4b54858cc7.pdf</p> <p>The Policy and procedure have been communicated to and understood by employees and others acting on behalf of the Entity. The Entity provides various anonymous reporting channels such as a whistleblowing mailbox and a hotline on the official notice board. The Entity has demonstrated that the Anti-Bribery Management System is effective.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Ethics and Business Conduct: http://innovationmetal.com/d/file/p/2023/12-22/fab1ccd3021aeea5e065df9e8dbe8d58.pdf</p> <p>The Code has established guidelines for the Entity's labour, health and safety, environment, business ethics and governance performance. The Code will be reviewed every five years and on any changes to the Business that alter Material environmental, social and governance risk(s) or on any indication of a control gap.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has Implemented and maintained a series of Policies consistent with the environmental, social, and governance practices. The Policies have been approved by the General Manager and at the same time are supported through the provision of appropriate resources. The Entity has also established an Environmental, Health and Safety Management system and a Social Responsibility Management System.</p> <p>The Management Systems are reviewed annually and when any changes to the Business that alter Material environmental, social and governance risk(s) or on any indication of a control gap. The Policies are communicated internally at orientation and via training.</p> <p>They are available to external Stakeholders via the Entity's headquarters website at: http://www.zfsy.com.cn/uploadFiles/files/20240616162436.pdf</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	A Senior Management Representative has been nominated by the Entity. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System, which has been certified according to ISO 14001:2015: http://www.zfsy.com.cn/uploadFiles/files/20240616162452.pdf
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established both a Social Responsibility Management System and an Occupational Health and Safety Management System including a Social Responsibility Policy. The Entity has implemented a Due Diligence process for its employees, communities and suppliers.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a sourcing management procedure. The Responsible Sourcing Policy has defined the relevant requirements, and is available at: http://www.zfsy.com.cn/uploadFiles/files/20240616161902.pdf The Responsible Sourcing Policy is communicated to both raw and auxiliary materials suppliers and Contractors regarding environmental, social and governance towards the suppliers.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity became an ASI member. The Entity has evaluated its Environmental, social, cultural and Human Rights Impacts and evaluated the effectiveness of occupational hazard control during the Entity's factory construction. The identified risks on social, environment, OH&S and governance are assessed, and the associated control measures are established and implemented. In addition, the Entity has created Social Responsibility, Environmental, and Safety System Management Manuals to conduct environmental, social, cultural, and Human Rights Impact Assessments (HRIA), which include a gender analysis for New Projects or significant changes to existing Facilities. Additionally, an Environmental Impact Assessment Report has been provided for existing Facilities. The Entity has obtained certification to both ISO14001:2015 and ISO45001:2018.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity became an ASI member. The Entity has assessed its Human Rights risk in accordance with its Human Rights Due Diligence Management Procedure and has concluded that there are no significant Human Rights risks on site. Human Rights Commitment: http://www.innovationmetal.com/d/file/p/2023/12-22/3e66e9915aa3f96f01e8cacc0dd636c.pdf Human Rights Policy: http://www.zfsy.com.cn/uploadFiles/files/20240616162624.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan which addresses fire and excessive discharge of domestic sewage and emissions. All of the employees are trained on the emergency plan with regular drills. Except for the local Ecological and Environmental

CRITERION	RATING	COMMENT
		<p>Protection Bureau and Emergency Management Centre required the Entity to provide Emergency Response Plans, no other relevant parties have made any requests.</p> <p>The Entity has lodged the emergency plan with the local Ecology and Environment Bureau and Emergency Management Centre as required by law. No other parties have requested a copy of the plan.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has identified the shutdown of the Casting furnace as the main risk that may lead to the suspension of operations, which will likely lead to significant adverse environmental, social and governance impacts.</p> <p>The Entity has established a Management of Suspension of Operations Procedure including a business resilience plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which takes into account Material adverse environmental, social and governance impacts.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established Management control procedures for investments and acquisitions, such as carrying Due Diligence. Since January 2023, there has been no merger or acquisition activity undertaken by the Entity.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a procedure for Closure, Decommissioning and Divestment. Since January 2023, there have been no Closure, Decommissioning and Divestment.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's Sustainability Report addresses the Material impact and governance approach regarding environmental, social and economic topics: http://www.zfsy.com.cn/uploadFiles/files/20240616162529.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has established an ASI Code of Conduct which specifies the annual public disclosure on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.</p> <p>http://www.zfsy.com.cn/uploadFiles/files/20240616161756.pdf</p> <p>The Entity's Public Credit Information Report of Legal Person and Unincorporated Organization issued by Credit China (https://www.creditchina.gov.cn) was verified. A search on the official websites of non-government organisations (NGOs) demonstrated no significant fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law in 2023 raised by government agencies.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity's Payment to Government Management Procedure and financial rules stipulate the payment to the Government should obtain approval from the Chairman of the Board after the financial audit. Any donations are publicly disclosed on their website. There were no donations in 2023, as verified in the Financial Report at Audit.</p> <p>As a subsidiary, the Entity's compliance statement is disclosed in the headquarters in the Annual Financial Report of the Group Company: https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-04-18/600595_20240418_L9Z5.pdf</p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has had an accessible Complaints Resolution Mechanism which is reviewed annually. On-site testing of the complaint hotline demonstrated there were no issues. The hotline number and email for the complaint is disclosed to all interested parties on the website (http://www.zfsy.com.cn/uploadFiles/files/20240616161919.pdf) and internally on-site on the Supervisory Notice Board.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has established the Greenhouse Gases (GHG) Inventory Procedure and developed Life Cycle Assessment (LCA) Report and Product Carbon Footprint (PCF) Verification Statement for one tonne of 3104 Aluminium alloy plate ingot products. However, it was identified the LCA Report did not use the database that is required in accordance with the principles of ISO 14044.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has established the GHG Inventory Procedure and developed LCA Report and Product Carbon Footprint (PCF) Verification Statement for one tonne of 3104 Aluminium alloy plate ingot products. The statement includes the environmental impact categories of the life cycle from cradle to the gate. http://www.innovationmetal.com/d/file/p/2023/12-22/8d89b57650108ea677470c9914adf672.pdf Product Carbon Footprint (PCF) Verification Statement: http://www.zfsy.com.cn/uploadFiles/files/20240616161146.pdf Product Carbon Footprint (PCF) Verification Statement Overview: http://www.zfsy.com.cn/uploadFiles/files/20240616162358.pdf There have been no customer requests for cradle-to-gate LCA information on its Aluminium (containing) product(s).
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The process waste generated during the production of Aluminium products are 100% recycled based on different materials with established recycling or reuse targets. There is a Waste Material Classification standard that specifies that Scrap should be stored in different storage warehouses according to different burn loss rates and is labelled with the Scrap grades. The stored process Scrap is recorded based on incoming and outgoing quantities and is regularly evaluated to assess achievement against set goals.
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	Conformance	There is no regional or national collection and recycling systems with the local area, however, the Entity has set a target for the recycling of Aluminium Scrap from 2024 to 2030, including measures to achieve the target. Refer to the Entity's Strategy, chapters 5 and 6: http://www.zfsy.com.cn/uploadFiles/files/20240616162033.pdf

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established a GHG Inventory Procedure, which specifies the annual analysis and reporting of GHG emissions: http://www.zfsy.com.cn/uploadFiles/files/20240616161519.pdf</p> <p>There are direct and indirect (Scope 1 and 2) emissions data in its GHG Inventory Report but does not include Scope 3 emissions. In addition, the data were not verified by an independent body.</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 publicly disclosed a Schedule of Carbon Neutrality Action Plan: http://www.zfsy.com.cn/uploadFiles/files/20240616162304.pdf</p> <p>The schedule includes GHG reduction targets and plans are established according to the Science Based Targets Initiative (SBTi) targeting methodology and progress under 1.5°C scenario for the Aluminium Sector. The Entity also excerpts from its 2022 Annual Report on its GHG emission reduction plan in the coming years and publicly disclosed on its headquarters website at: http://www.zfsy.com.cn/uploadFiles/files/20240616161519.pdf</p> <p>In 2023, the Entity has planned to reduce CO₂ emissions by three percent from the baseline of 2022 and decrease by 3.5%, and this target has been achieved. There is a GHG reduction pathway in the 2024 reduction plan, such as reducing raw material loss, encouraging suppliers to research carbon reduction technologies, saving electricity consumption in the production process; choosing raw materials with shorter transportation distances; promoting the development of green design in the industrial chain and create a green supply chain.</p> <p>However, it was identified the GHG Emissions Reduction Pathway does not include Intermediate Targets with only initial and final reduction targets within their disclosures.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established an Energy Management System Manual and implemented a GHG Emissions Management System, which request the implementation of GHG emission-controlling measures and annual analysis of GHG emissions according to ISO 14064-1:2018 to achieve performance aligned with the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity has established an Air and Water Pollutant Emissions Management Program which requires testing emissions according to the request in Pollution Discharge License, Total Suspended Particulate (TSP) and non-methane total hydrocarbons (NMHC) are tested every month. The Entity has publicly disclosed its exhaust gas emissions in

CRITERION	RATING	COMMENT
		<p>2023 on its website at: http://www.zfsy.com.cn/uploadFiles/files/20240616161956.pdf</p> <p>However, it was identified there is no public disclosure of an emissions reduction plan.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has established an Air and Water Pollutant Emissions Management Program, which requires a review of the water pollutant reduction plan annually and following any changes leading to a pollution risk. The Entity only discharges sewage water and not industrial wastewater, so there is no plan required to minimise exposure to and impacts from Discharges to Water. The Entity has publicly disclosed the total quantity of pollutants discharged into the water in 2023 on its website at: http://www.zfsy.com.cn/uploadFiles/files/20240616161956.pdf</p> <p>The Environmental Impact Assessment (EIA) Report has been prepared by a Third Party. The EIA report has quantified Discharges to Water that may have adverse effects on humans or the environment. After assessment, the adverse impact on water is very low. The report demonstrated that the discharged wastewater is domestic sewage, and the main pollutants are Suspended Solids (SS), Chemical Oxygen Demand (COD) and ammonia nitrogen (NH₃-N). The water used in production is circulating cooling water and is not discharged. The Entity has established a wastewater treatment Facility to treat wastewater.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established the Environmental Factors Identification and Control Program and an ASI Management Manual, which require regular review of the risk of environmental impact from Leakages and develop management plans to prevent, detect and remediate Spills or Leakages. There is a management plan to prevent, detect and remediate Material Spills and Leakages (including compliance controls and a monitoring program). The ASI Management Manual prescribes a review of the Emergency Plan at least every three years or after any Spill or Leakage event or any changes to the business after Spills and Leakage risks. The same applies to any indication of a control gap.</p> <p>The Entity has publicly disclosed the Spills and Leakages Risk Evaluation Report which identified and evaluated major risk areas of operations where Spills and Leakages could contaminate air, water and soil: http://www.zfsy.com.cn/uploadFiles/files/20240616161221.pdf</p> <p>The Training, Checking and Contingency Plans for all kinds of Leakage and Spills are available: http://www.zfsy.com.cn/uploadFiles/files/20240616161626.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established the ASI Management Manual, which requires publicly disclosing to affected organisations and communities the volume, type and potential impact once a Material Spills and Leakage incident occurs. Until now, no Spills or Leakages have occurred.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has established Waste Control Procedures and implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy.</p> <p>However, it was identified that the quantity of solid waste including Hazardous and Non-Hazardous Waste generated in 2023 was not</p>

CRITERION	RATING	COMMENT
		included in the Strategy. The disposal methods of solid waste are available at: http://www.zfsy.com.cn/uploadFiles/files/20240616162228.pdf
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	<p>The Entity has established Waste Control Procedures and has implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy.</p> <p>The Entity's Dross storage condition on-site was verified which met with requirements of draught-proofing, rain-proof, sunshades, and anti-seepage measures. A Contractor with an annual contract is responsible for the transfer and disposal of Aluminium Dross as Hazardous Waste. The Entity tracks its disposal method as landfill. No Dross was transferred last year.</p> <p>The Entity is also looking at alternatives to landfilling Dross and is developing a project with several companies to recycle Dross into cement additives.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resource Management Report, they draw water from the municipal water company. The Environmental Impact Assessment Report includes their water source and sewage discharge. The Entity records the water usage monthly, and all wastewater was recycled for cleaning and green irrigation.</p> <p>The quantity of water usage and discharge is available in the Water Resources and Water Use Report: http://www.zfsy.com.cn/uploadFiles/files/20240616161658.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment Report demonstrated the impact of its operations on water is very low on local water resources.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has established procedures for the protection and biodiversity conservation and has developed a Biodiversity Assessment Report: http://www.zfsy.com.cn/uploadFiles/files/20240616162641.pdf</p> <p>The Entity is located in Yuanjiaba Nonferrous Metal Industrial Park in the Guangyuan City Economic and Technological Development Zone developed by local government. The EIA of the Entity's 150kt/a High-precision Aluminum Alloy Plate Ingots Project (completed in 2022) and the EIA of the industrial park plan have assessed the risk and Material impact on biodiversity from the land use and activities in the Entity's Area of Influence is very small. The risks and potential impacts of physical biodiversity and Ecosystem Services are low.</p>

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as according to the Environmental Impact Assessment Report and the Biodiversity Assessment Report, the risks and potential impacts identified are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as according to the Environmental Impact Assessment Report and the Entity's Biodiversity Assessment Report, the risks and potential impacts identified are assessed 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 impacts have been identified.
8.4 Alien Species	Conformance	<p>The Entity has established an Alien Species Management Procedure. The Entity has inventoried alien and/or invasive species from the Invasive Alien Species of China (IASC) (https://www.plantplus.cn/ias) and assessed the risk of their potential impacts. Wooden packaging is either fumigated or quarantined.</p> <p>The Entity is in the Yuanjiaba Nonferrous Metal Industrial Park, developed by the local government. Based on the Environmental Impact Assessment Report, there are no significant risks and impacts on biodiversity in the Entity's Area of Influence.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity has established both 'Procedures for Protect Biodiversity Conservation' and 'Impact Assessment Regulation of New Project' in which the Entity has committed to "No Go" in World Heritage Properties. The Entity is located in Yuanjiaba Nonferrous Metal Industrial Park, there are no World Heritage Properties near the Entity in the Chinese World Heritage List.</p>
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, based on the Environmental Impact Assessment Report and Biodiversity Assessment Report. The Entity is located within an Industrial Park, with no Protected Areas located nearby.
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	<p>The Entity has identified potential Affected Populations and Organisations and has established and implemented a Human Rights Policy that requires it to identify, prevent, mitigate and account for its actual and potential impacts on Human Rights. The Due Diligence process is established covering the supply chain alongside a complaints/grievance channel to Stakeholders including the contact details of the Vice General Manager.</p> <p>No adverse impact on Human Rights were reported, and currently no remedial actions are required.</p> <p>Human Rights Policy: http://www.zfsy.com.cn/uploadFiles/files/20240616162624.pdf</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a Protection of Female Employees Procedure to ensure that women's rights and interests are respected. The Entity has identified the legal rights of women and has established control measures to ensure that these rights are respected.</p> <p>Female and male employees receive equal pay for equal work, and are equal in terms of promotion, evaluation of professional and technical positions, and social benefits. More details are available in the summary of work to protect women's rights: http://www.zfsy.com.cn/uploadFiles/files/20240616162609.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. However, the Entity has established a Management Procedure of Indigenous Peoples and publicly committed respect for the rights and interests of Indigenous Peoples in the Entity's Human Rights Policy, available at: http://www.zfsy.com.cn/uploadFiles/files/20240616162624.pdf</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.</p>
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	<p>This Criterion is not applicable, as there are no sites of cultural value and/or sacred heritage within the Entity's Area of Influence. The Entity is located within an Industrial Park which was developed by the local government.</p> <p>However, the Entity has established a requirement to conduct a feasibility study for any new, renovation and expansion projects, which includes the exploration and protection of sacred or cultural heritage sites.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects and Major Changes that require resettlement.</p> <p>However, the Entity has established a Resettlement Management Procedure that requirements them to avoid involuntary resettlement to the greatest extent possible, and to develop a resettlement plan in cooperation with local Stakeholders, law firms, government agencies and immigration experts prior to the commencement of any resettlement activities.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity's current operations have no negative impact on the Local Community. The Entity has publicly disclosed its contribution to local</p>

CRITERION	RATING	COMMENT
		<p>society in its Social Responsibility Report, Chapter 6, 'Social Welfare', page 7: http://www.zfsy.com.cn/uploadFiles/files/20240616161501.pdf</p> <p>Should any new renovations and expansion projects occur, the Entity will conduct Environmental and Social Impact Assessments. The Entity has publicly disclosed its Environment Impact Assessment Report for the 150,000 tonne/High-precision Aluminum Plate Ingot Project and the assessment result has been included on the National Information Platform for Environmental Impact Assessment for Construction Projects: http://hbj.cngy.gov.cn/News/show/20231026092411526.html https://jq.cngy.gov.cn/new/show/20240123093712401.html</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established an integrated quality, Environmental and Occupational Health Management System in accordance with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018, and has also prepared a Social Responsibility Management Manual developed in accordance with the SA 8000:2014 standard. Supply chain management has been included the listed Management Systems.</p> <p>The Entity's Responsible Procurement Policy is available at: http://www.zfsy.com.cn/uploadFiles/files/20240616161902.pdf</p> <p>On the base of Sourcing management procedure, the Responsible Purchasing Policy must be communicated to all suppliers and Contractors.</p> <p>The Entity has also established a supply chain complaint mechanism (landline:0839-6069901; E-mail: jiandu@yulian.com.cn).</p> <p>The Conflict-Affected and High-Risk Areas (CAHRAs) Due Diligence Management Procedure has been established, and Due Diligence has conducted annually on all Aluminium material or Recycled Aluminium suppliers coving environmental, social and governance aspects. The survey form and other records confirm that the Entity has identified CAHRAs in the supply chain, and has taken measures to provide advice, training, or warnings to CAHRAs suppliers. The Entity's business or purchasing is not affected by CAHRAs.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	<p>The Entity has established a CAHRAs Due Diligence Management Procedure, which includes a sourcing management and supplier survey addressing CAHRAs management. The Entity has identified and assessed risks within the supply chain, confirming that no supplier sources from or operates through CAHRAs areas.</p> <p>However, the CAHRAs Due Diligence Form sent to Aluminium suppliers does not include the requirement to respect Human Rights that would indicate a failure to implement the Management System.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	<p>The Criterion is not applicable to the Entity, as the Entity did not identify any or potential risks within their business or purchasing activities affected by CAHRAs.</p> <p>However, the Entity has developed and implemented strategies to address identified environmental and safety risks through the procurement system.</p>

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of Due Diligence	Conformance	The Entity was audited against the ASI Performance Standard which includes an Audit on Due Diligence processes and addresses this requirement of the Standard.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has publicly disclosed its Supplier Due Diligence Results Ledger which provides the result of the Entity's CAHRA Due Diligence assessment: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fwww.zfsy.com.cn%2FuploadFiles%2Ffiles%2F20240616162209.xlsx&wdOrigin=BROWSELINK4
9.9 Security practice	Conformance	The Entity has implemented a series of security management programs with the requirement for security providers to implement security practices that respect Human Rights in accordance with the Human Rights Policy. All security guards had been trained to respect Human Rights requirements. To date, no Human Rights violations have occurred at the Entity that related to security practices.
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 the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity employs 67 Workers, six of whom are members of the established union, with a women's union acting as a branch of the union. The union's constitution sets out the procedure for electing union representatives and members' rights, although Freedom of Association is not absolute in China. Currently, the Entity does not have a Collective Bargaining Agreement.
10.2a Child Labour	Conformance	The Entity has established the Regulations and Remedial Measures Procedure for Child Labour and Underage Workers Management in line with ILO Conventions C138 and C182 on Child Labour. Workers under the age of 16 may not be employed, and it is also prohibited to engage underage Workers in hazardous work. An interview with the Director of the Human Resources Department confirmed that the Entity's youngest employee is 23 years old.
10.3a-c Forced Labour	Conformance	The Entity has established the Prohibition of Forced Labor Management Procedure regarding the prohibition of Forced Labour. Human Rights Policy: http://www.zfsy.com.cn/uploadFiles/files/20240616162624.pdf The Modern Slavery Statement detailing its actions to address Modern Slavery is available at: http://www.zfsy.com.cn/uploadFiles/files/20241104152656.pdf Interviews with various employees, including management and operators confirmed they are not forced to work. The Entity does not withhold Workers' personal belongings, and there are no deposit or bond requirements.

CRITERION	RATING	COMMENT
10.4a-c Non-Discrimination	Conformance	The Entity has established an 'Anti-Discrimination Management Control Program'. The Entity has provided Human Rights including anti-Discrimination training to all employees. There have been no cases of unfair dismissal of Workers and all departures are voluntary.
10.5 Communication and engagement	Conformance	The Entity has established Complaint Management Procedures including channels for Stakeholder complaints, appeals and information requests: http://www.zfsy.com.cn/uploadFiles/files/20240616161919.pdf Employees have the right to communicate openly with management to ensure that Workers can discuss the content of the negotiations, make suggestions and comments about the work environment and management practices without fear of Discrimination, retaliation, threats or sexual harassment.
10.6a-g Violence and Harassment	Conformance	The Entity's Human Rights Policy includes a commitment with respecting the Human Rights of employees and prohibits rough and inhumane treatment of employees: http://www.zfsy.com.cn/uploadFiles/files/20240616162624.pdf The Human Rights Policy has been consulted with employees and their representatives and is signed off by employee representatives before it is issued. The Entity has established a management review process that requires an annual review and additional reviews in the event of significant changes or deficiencies. Interviews with staff representatives, female operational staff, trade union representatives and employees of suppliers all indicate that there have been no incidents of Violence and Harassment at the Entity.
10.7a-c Remuneration	Minor Non-Conformance	The Entity established control procedures for hours of work and salary and welfare management according to regulations. Wages are paid on time, in legal tender and are fully documented. The Entity's calculation of Overtime compensation meets the requirements of the regulations and employees are satisfied with their salary levels. However, it was identified the High-temperature Allowance paid to some employees fell below the minimum required by local regulations.
10.8a-c Working Time	Conformance	The method used to calculate Overtime compensation complies with the regulations. Based on a sample of three employees' Overtime schedules over 12 consecutive months, no employee worked more than an average of eight hours per day.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights when they sign their contracts and explains in detail how they are guaranteed in the employee handbook. Social responsibility training for Workers includes the right to Freedom of Association.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System, which includes a management manual and relevant procedural documents.

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The OH&S Management System is subject to an annual internal audit and an annual management review of the EHS Management System and has successfully undertaken an independent third-party ISO 45001:2018 audit.</p> <p>The review of the latest external audit report of the OH&S management system confirmed no non-conformances. To date, no fines or corrective action requests have been received from government agencies or other Stakeholders.</p> <p>The Entity has comparatively analysed its OH&S goals with the leading practices and performance in the industry, and publicly disclosed these analysis results: http://www.zfsy.com.cn/uploadFiles/files/20240616161414.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented Safety Committee and a trade union. The Safety Committee is responsible for formulating or revising the Production Safety Management System, organising regular production safety inspections, and keeping records. It also conducts employee satisfaction surveys annually, collects suggestions or opinions on OH&S from employees, and provides feedback on the results for adoption.</p> <p>The Labour Union and the Safety Committee investigates and analyse employee work safety accidents, formulate improvement measures, and implement them annually. The Entity has developed a mechanism for identifying concealed hazards, and employees at the shift level report weekly on potential OH&S hazards. The Safety Committee organises corrective actions and verifies the effectiveness of these actions. The Entity has informed employees of their rights at the signing of their employment contracts and via the Employee Handbook, which explains in detail how their rights are guaranteed.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 November 2024	Initial Certification Audit - Full Certification