

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

YUNNAN HONGTAI NEW MATERIAL CO., LTD.

CERTIFICATE
NUMBER

244

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

30 JANUARY 2023

DATE OF EXPIRY

29 JANUARY 2026

CERTIFIED SINCE

30 JANUARY 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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

All activities of the A-Series, B-Series, C-Series, E-Series and F-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	China Hongqiao Group Co., Ltd.
ENTITY NAME	Yunnan Hongtai New Material Co., Ltd.
CERTIFICATION SCOPE	All activities of the A-Series, B-Series, C-Series, E-Series and F-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (26 – 30 September 2022)Surveillance Audit (9 – 12 September 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">26 – 30 September 2022 (Initial Certification Audit)9 – 12 September 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 November 2022 (Initial Certification Audit)25 October 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (26 – 30 September 2022)</u></p> <p>All activities of the A-Series, B-Series, C-Series, E-Series and F-Series electrolytic aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The facilities are mainly engaged in the technical research and development, production and sales of liquid aluminium and aluminium ingots products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses

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

Surveillance Audit (9 – 12 September 2024)

All activities of the A-Series, B-Series, C-Series, E-Series and F-Series electrolytic Aluminium production lines of Yunnan Hongtai New Materials Co., Ltd. in Wenshan City, Yunnan Province, China. The Facilities are mainly engaged in the technical research and development, production and sales of liquid Aluminium and Aluminium ingots products.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant 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

30 January 2023 – 29 January 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

29 January 2026

CERTIFICATE
NUMBER

244

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has implemented systems to maintain awareness of and to ensure compliance with Applicable Law. However, it was identified that one applicable provincial regulation is not identified by the Entity.
1.2 Anti-Corruption	Conformance	The Entity has established Policies and implemented processes to identify and prevent Corruption, including a Management Procedure of Anti-Corruption, and personnel have been trained in these processes. There were no Corruption cases reported within the past two years.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that addresses the principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among its business partners and suppliers. The Code of Conduct, page 3: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented a Labour and Business Ethics Policy covering environmental, social and governance management issues, page 17: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrate commitment to the Policies and provide the resources for implementation.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its Labour and Business Ethics Policy covering environmental, social and governance management issues, page 17: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf Training is provided internally on the Policy.
2.2 Leadership	Conformance	A senior Management Representative has been nominated with the responsibility for conformance with the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System (EMS) and is planning to certify the EMS to ISO14001:2015 at the end of 2025.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Supplier Code of Conduct that addresses responsible sourcing which addresses the Material environmental, social and governance aspects relevant to suppliers, page 9: http://www.honggiaochna.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%EF%BC%882024%EF%BC%89.20240724144221.pdf The Entity conducts second party Due Diligence audits at major next tier suppliers' sites in order to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements.
2.5 Impact Assessments	Conformance	The Entity was established in 2020, and as a New Project, conducted Impact Assessments on environmental, social, cultural and Human Rights, including a gender analysis. All Impact Assessment Reports are registered with the local authority and communicated to affected Communities and Stakeholders. The Entity commits to conducting Impact Assessments for New Projects or Major Changes as necessary in future.
2.6 Emergency Response Plan	Conformance	The Entity has established comprehensive emergency action plans to address fire, earthquake, hazardous chemical leak, extreme weather, and key equipment breakdowns. Emergency Response Plans are developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and have been registered with relevant government agencies in compliance with ISO standard requirements and legal requirements. The employees are provided with the relevant training courses and the exercises are conducted for fire/evacuation, and chemical leaks.
2.7 Mergers and Acquisitions	Conformance	The Entity respects the mergers and acquisition management procedure of the parent company and assists the Group headquarters in reviewing

CRITERION	RATING	COMMENT
		environmental, social and governance issues as required. No such activity has occurred since the Entity commenced operation in 2021.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity respects the closure, decommissioning and divestment management procedure of the parent company and assists the Group headquarters in reviewing environmental, social and governance issues as required. No such activity has occurred since the Entity commenced operation in 2021.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Hongqiao Group, the parent company of the Entity published the annual ESG Report for 2023. The includes key performance indicators such as Human Rights indicators, EHS indicators and the number of accidents. A third party verifies the Report. The 2023 ESG report is available at:</p> <p>http://www.hongqiaochina.com/Uploads/File/2024/05/09/%E4%B8%AD%E5%9B%BD%E5%AE%8F%E6%A1%A5ESG%E5%B9%B4%E5%BA%A6%E6%8A%A5%E5%91%8A2023.20240509111410.pdf (Chinese Simplified)</p> <p>http://en.hongqiaochina.com/Uploads/File/2024/04/20/E24010250-China%20Hongqiao-ESG.20240420081856.pdf (English)</p>
3.2 Non-compliance and liabilities	Conformance	The Entity will publicly disclose any 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 and therefore are not reported in the 2023 ESG Report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's payments to governments are listed in the financial report, which is audited by a Third Party. The Entity only makes, or have made on its behalf, payments to governments on a legal and/or contractual basis.
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	<p>The Entity has established an internal complaints and grievances reporting mechanism that includes a hotline, suggestion boxes and a grievance handling council. The complaint handling system for Stakeholders for external complaints can be made via a whistleblowing hotline, page 13:</p> <p>http://www.hongqiaochina.com/Uploads/File/2024/07/2</p>

CRITERION	RATING	COMMENT
		4/YunnanHongtai%20ASI%20%EF%BC%882024%EF%BC%89.20240724144221.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has compiled an environmental Life Cycle Assessment (LCA) Report. The assessment covers all products (liquid Aluminium and Aluminium ingots) and production lines. The LCA covers environmental impacts including resource consumption, energy consumption, air emission, Greenhouse Gas (GHG) emissions and solid waste discharge.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium Products addressing all production processes and main supporting activities, such as transportation waste disposal. A Third Party has assessed the carbon footprint for liquid Aluminium and Aluminium ingots. The LCA Report can be provided by external Stakeholders as required, however to date, no such request has been received.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's Aluminium Life Cycle Assessment Report, (page 35) is available at: http://www.honggiaochna.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%EF%BC%882024%EF%BC%89.20240724144221.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established a target to recycle 100% of Aluminium Process Scrap. Scrap is generated in the Casting process. As per the site observation and document review, the scrap is 100% recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	In accordance with the content analysis report and management interviews, the Entity's product is 100% Aluminium and separation is not needed.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy, including specific timelines, activities and targets. The Entity communicates with the main customer to discuss how to improve the recycling rate of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no local, regional or national collection and recycling systems for Aluminium scraps in China. The Entity works with the customer to decide how to improve the recycling rate of products at End of Life.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has calculated its 2023 Greenhouse Gas (GHG) emissions using the calculation formula defined in the China National Standard and the electricity conversion factor defined by the government authority. Major Scope 1 and 2 GHG emission types and energy use have been disclosed in the 2023 GHG Emissions Inventory Report, page 39:</p> <p>http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E4%BC%882024%E4%BC%89.20240724144221.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity is a part of the China Hongqiao Group and has established an overall strategy for GHG emissions reductions, including a 30% reduction in the carbon footprint by 2030 and carbon neutrality by 2050. Based on the Group strategy and the GHG emissions in 2021, the Entity established a reduction target with the primary measure to use more green electricity (hydroelectricity and solar power). Greenhouse Gas Emission Targets and Implementation Plan, page 60:</p> <p>http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E4%BC%882024%E4%BC%89.20240724144221.pdf</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity has established and implemented an Energy and Carbon Management System based on the China Hongqiao Group strategy of peak carbon in 2030 and carbon neutrality by 2050. Key performance indicators have been established for energy consumption in each production process and are monitored monthly. The Energy Management System conforms with ISO 50001 and the Entity is seeking certification.</p>
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	<p>This Criterion is not applicable, as whilst the Entity commenced production in October 2020, GHG emissions were not calculated due the short period of time.</p>
5.3c Aluminium Smelting (after 2020)	Conformance	<p>The Entity's main energy supply is sourced from hydroelectricity (85%), significantly reducing GHG emissions. The Entity's Scope 1 and 2 GHG emissions from the production of Aluminium is 3.87 tonnes CO₂e per metric tonne Aluminium.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has conducted an Environmental Impact Assessment to identify and quantify the Emissions to Air that have adverse effects on humans or the environment. The Entity has established the emissions treatment facilities required and the operational requirements to treat the emissions prior to release and has monitored the air emissions at the required interval. The monitoring results in 2023 and 2024 indicate emissions are below the legal emissions limit.
6.2 Discharges to Water	Conformance	Wastewater is collected, treated and 100% reused on site (cooling processes, toilet flushing, irrigation) in accordance with the Entity's Pollutant Discharge Permit. There is no discharge to external drainage/water systems.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Based on the approved Environmental Impact Assessment Report, the Entity has identified and assessed the major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the Emergency Response Plan for environmental incidents in which the control methods for the identified spill/leakage are defined. The required spill management facilities are in good order. The Entity has provided training on the plan to the relevant Workers and has conducted emergency drills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has defined the requirement to report Spills and Leakages in the Emergency Response Plan, which also addresses responsibilities and the reporting process. No Spills occurred in 2023 or during 2024 prior to the Audit.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Performance Standard management manual defines the environmental performance will be disclosed publicly, including the Impact Assessments of the Spills and remediation actions taken, and report annually. The report of risks identification and assessment of Spills/Leakages are disclosed in the annual Environment Performance Report for 2023, page 77: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%EF%BC%882024%EF%BC%89.20240724144221.pdf
6.5a Waste management and reporting (strategy)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste

CRITERION	RATING	COMMENT
		disposal methods are disclosed in the annual Environment Performance Report for 2023, page 75 at: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods are disclosed in the annual Environment Performance Report: https://mp.weixin.qq.com/s?__biz=MzkyMjM3MDkwOA==&mid=2247483836&idx=2&sn=a6a6fff7771d9f3d1b99ab0ab743cd44&chksm=c1f4178ff6839e99a1f92ae3444dd8b2eb12978c5fd3bfa91e818041d0cd593883e01f904890&token=1409156807&lang=zh_CN#rd
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has a dedicated Hazardous Waste storage area for Spent Pot Lining (SPL). The SPL is transferred to a licensed supplier for further treatment, and the final residuals are landfilled in the dedicated landfill approved by the local authority. The Entity has conducted testing of the underground water and nearby soil to monitor SPL leakage controls. Relevant waste management training is provided to Workers.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	Before being transferred, the anode materials in SPL are pre-treated to extract the electrolytes to be re-used in the electrolyzation process. Upon transfer to the licensed supplier, SPL is further treated to neutralise the harmful substance, and the recyclable materials are recovered.

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity transfers SPL to a licensed supplier for treatment and disposal. SPL is further treated to neutralise harmful substances, and recyclable materials are recovered, and non-recyclable components are landfilled. Disposal of waste is approved by and strictly monitored by the relevant Government agency.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	According to China's environmental regulations, SPL is strictly required to be disposed of as Hazardous Waste and approved by the government agency. The Entity has implemented a process to collect information on any regulatory changes in SPL disposal methods and consider alternative options to landfilling.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	In accordance with China's environmental regulations, SPL is not permitted to discharge into marine or aquatic environments. No leakage into these environments is found at the Entity or the licensed disposal supplier.
6.8a Dross (recovery)	Conformance	In accordance with legal requirements on Hazardous Waste, the Entity transfers Dross generated at the Casthouse to licensed suppliers for treatment to recover Aluminium.
6.8b Dross (recycling)	Conformance	In accordance with legal requirements on Hazardous Waste, the Entity transfers Dross generated at the Casthouse to licensed suppliers for disposal. Besides the recovered Aluminium, Other non-Aluminium materials are also extracted from Dross is recycled for other purposes.
6.8c Dross (review of alternatives)	Conformance	The Entity annually evaluates the Dross licensed supplier to review the alternative options to landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use. The Entity only sources water from the municipal water supply and identifies the discharge and consumption source. The water balance analysis has been conducted.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment which considered the Entity's Area of Influence. Due to the nature of the product and production processes and that the Entity 100% recycles wastewater after treatment and does not discharge water to external environments, the level of water-related risk was identified as low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Conformance	There were no significant water-related risks identified in the Entity's Area of Influence. The Entity recycles 100 percent of the wastewater and does not discharge it into the external water environment.
7.2b Water management (monitoring)	Conformance	There were no significant water-related risks identified in the Entity's Area of Influence. Wastewater is monitored every quarter following treatment and 2023 and 2024 results indicate the water quality meets the National Standard of the People's Republic of China for reuse of urban recycling water.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its Water Usage and Risk Assessment Report, page 25: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a Biodiversity Risk Assessment as part of the approved Biodiversity Risk Assessment Report, page 20: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%E5%BC%882024%E5%BC%89.20240724144221.pdf The findings confirm that the risk to biodiversity is assessed as low.
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	Based on the Biodiversity Risk Assessment Report, the Entity has very few opportunities to introduce Alien Species during its operation and supporting activities. The Entity provides relevant training courses to employees to minimise the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity.
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.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Policy commitment to respect Human Rights and has communicated this to all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and a Due Diligence process is established covering Local Communities and the supply chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channels 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. No complaints from women Workers have been received.
9.3 Indigenous Peoples	Conformance	The Entity has established and implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. The local government is responsible for the land acquisition, employment replacement and communications with Indigenous Peoples involved in the development of the industrial zone where the Entity is located. The Entity has paid all compensation fees in accordance with the regulations. Indigenous Peoples’ representatives present that the Entity respects their rights and interests, and living standards have improved.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity is responsible for assisting relevant government departments in communicating with Indigenous residents on the Entity’s environmental protection measures, employment opportunities and other issues of concern to Indigenous Peoples. The Entity communicated with affected Indigenous Peoples during the project planning stage and the Indigenous People are satisfied with the results of the

CRITERION	RATING	COMMENT
		Entity's communication and support and have welcomed the establishment of local enterprises.
9.5 Cultural and sacred heritage	Conformance	The Entity has established and implemented a procedure to identify and manage cultural and religious sites and has conducted a risk assessment to reduce the impact on the sites. The Entity has identified a Solar Temple near the site and confirms that its activities do not have any impact on this religious site.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has established a Policy and management procedure to consider feasible alternatives to avoid or minimise physical and/or economic displacement in project designs. The interests and concerns of Stakeholders were considered during the design and implementation phases of the project to minimise the impact of the Resettlement, while balancing environmental, social and financial costs and benefits.
9.6b Resettlements (where unavoidable)	Conformance	During the development of the industrial estate, the Entity actively participated in a tripartite consultation and communication mechanism with the government and Indigenous Peoples and assisted the industrial estate development authority and the affected Indigenous Peoples to reach a mutually satisfactory and legally compliant resettlement plan.
9.7a Local Communities (rights and interests)	Conformance	The control measures for the identified impacts on Local Communities are established and implemented. No complaint from the Local Communities has been received.
9.7b Local Communities (impacts)	Conformance	The Entity has identified and assessed the impact on the Local Communities. The control measures for the identified impacts on Local Communities are established and implemented. There has been no complaint from the Local Communities received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with Local Communities and a high proportion of its employees are from these Communities, with around 80% of employees are from communities within the region. The Entity has joined the initiative proposed by the local government for donations to schools and kindergartens for the development of local education.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity commits to not using conflict minerals and communicates this through the Aluminium value chain. As part of the Due Diligence process, all suppliers are required to sign a commitment letter to not use conflict

CRITERION	RATING	COMMENT
		minerals. To date, no complaint on this issue has been received.
9.9 Security practice	Conformance	The Entity has established and implemented a Policy and procedure to commit to respecting Human Rights in security practices. All security guards are the Entity's contracted employees and are required to work in humane ways. No grievance or complaint against security activities has been received to date.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits to respect the Workers' rights. There are sixteen elected Worker representatives including three women.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The management demonstrates the rights of Workers to collectively bargain is respected. There are no collective bargaining agreements in the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives meet regularly and act on behalf of Workers and address their concerns with management.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in China. The Entity has implemented a Policy prohibiting the use of Child Labour and there is no Child Labour or young Workers in the Entity.
10.2b Child Labour (hazardous)	Conformance	There is no Child Labour or young workers in the Entity. In accordance with legal requirements, protection measures are defined, such as medical checks, and ensure young Workers do not carry out hazardous work.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented a Policy prohibiting the use of Child Labour. 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 has implemented a Policy of prohibition against Forced Labour including Human Trafficking. The Policy is communicated internally and to suppliers.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented a Policy of prohibition against Forced Labour. Workers are not required to provide any form of deposit, recruitment Fees or equipment in advance.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented a Policy of Prohibition against Forced Labour. There are no foreign Migrant Workers present within the Entity.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented a Policy of Prohibition against Forced Labour. The Entity is not involved in Forced Labour and does not provide loans to Workers. Labour contracts signed between the Entity and Workers do not include terms related to Debt Bondage, and payslips indicate there are no illegal deductions.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established a procedure that defines there is no restriction on Workers' movement at the Entity. This was verified through interviews with Workers.
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 of original documents are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The signed labour contracts do not contain language to limit the Workers' ability to voluntarily terminate their employment. Workers know their right to terminate employment without penalty and the required notice time complies with labour contract law. The resigned Workers receive their wages without delay.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. No case of Discrimination has been received. The recruitment advertisement and the training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The interviewed workers confirm they feel equal.
10.5 Communication and engagement	Conformance	Direct and frequent communication with Workers and the Workers' representatives is established. The communication channels are announced to Workers, and Workers can complain and raise concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures including management procedures, complies with legal requirements and requires the confirmation of the involved Worker(s). The disciplinary measures are defined and communicated to Workers.

CRITERION	RATING	COMMENT
		Based on interviews with Workers, there have been no cases of the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined in the Entity. The basic wage is above the legal minimum wage and total payments meet Workers' basic needs. All Workers are enrolled in the mandatory social insurance scheme and house fund. Interviewed Workers confirmed they received training on the wage and benefits, understand the structure of wages, and sign their payslips.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid to Workers by bank transfer at the end of the following month.
10.8 Working Time	Conformance	Working hours are recorded. Working hours are monitored and the monthly Overtime working hours do not exceed the legal monthly limit, and Workers are guaranteed at least one day per week.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Policy that is approved by the senior management, page 17: http://www.hongqiaochina.com/Uploads/File/2024/07/24/YunnanHongtai%20ASI%20%EF%BC%882024%EF%BC%89.20240724144221.pdf The Policy is 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. The control measures for OH&S hazards for Workers and Visitors are established and implemented.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with the legal requirements and other requirements. The Entity has implemented systems to identify all applicable legal and related requirements and evaluate legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training courses to understand the hazards, OH&S risks and actions determined as relevant for them and their right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented OH&S Management System. The implementation and

CRITERION	RATING	COMMENT
		performance are monitored periodically, the non-conformances and incidents are recorded, analysed and corrective actions are developed and implemented as required.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in Health and Safety. Workers are encouraged to report their concerns or advice on OH&S issues, and management responds to the concerns and advice. The Entity maintains a register of employee complaints and advice. All employee concerns and advice on health and safety issues are investigated, analysed and action taken where necessary.
11.4 OH&S performance	Conformance	The Entity has established and documented Occupational Health and Safety targets in the OH&S Program. The implementation plans are established and implemented.

Document Control and Version History

Revision	Date	Notes
0	30 January 2023	Initial Certification Audit – Full Certification
1	13 November 2024	Surveillance Audit – Full Certification; Updated the Certification Scope and the Audit Scope for Initial Certification Audit to include to include 'E-Series and F-Series'.