# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Guangdong Longda Aluminum Industry Co., Ltd.

### CERTIFICATE NUMBER

424

### ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

CERTIFICATION LEVEL

CERTIFICATION

DATE OF EXPIRY

14 JANUARY 2028

#### ASI ACCREDITED AUDITING FIRM

### SGS-CSTC STANDARDS TECHNICAL SERVICES

**CERTIFIED SINCE** 

15 JANUARY 2025

AUTHORISED BY

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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**

Production of Aluminium Alloy ingots and cast Aluminium alloy liquid at Guangdong Longda Aluminum Industry Co., Ltd., Guangdong Province, China.

# AUDIT REPORT PERFORMANCE STANDARD

# **OVERVIEW**

MEMBER NAME	Lizhong Group
ENTITY NAME	Guangdong Longda Aluminum Industry Co., Ltd.
CERTIFICATION SCOPE	Production of Aluminium Alloy ingots and cast Aluminium alloy liquid at Guangdong Longda Aluminum Industry Co., Ltd., Guangdong Province, China.
SUPPLY CHAIN ACTIVITIES	<ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> </ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	• 19 – 22 November 2024
AUDIT REPORT SUBMISSION	• 3 December 2024
AUDIT SCOPE	The Audit Scope included the manufacture of Aluminium alloy ingots and cast Aluminium alloy liquid at Guangdong Longda Aluminum Industry Co., Ltd.
	<ul><li>Supply chain activities included in the Audit Scope:</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>
	All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<ul> <li>The Auditors confirm that:</li> <li>The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li>The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li>The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li> <li>The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	15 January 2025 - 14 January 2028

NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	14 January 2027
CERTIFICATE NUMBER	424
	If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <b>https://aluminium-stewardship.ethicspoint.com/</b>
	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**

Guangdong Longda Aluminum Industry Co., Ltd. (the "Entity") was established in 2006 and is located at No. 6, West Zone, Circular Economy Industrial Park, Shi Jiao Town, Qingcheng District, Qingyuan City, Guangdong Province, China. The Entity employs 138 people, including thirty-six women.

The Entity primarily focuses on the melting, alloying, and Casting design processes of cast Aluminium alloys. Its main products include cast Aluminium alloy ingots and cast Aluminium alloy liquid, which are produced for the domestic market. The Entity has the capacity to produce 100,000 tonnes of saleable products annually. Its facilities include seven melting furnaces, seven alloy furnaces, three Casting robot ingot stacking systems, one rotary kiln, two cold ash buckets, four Aluminium ash processors, and four cloth bag dust collectors.

The auxiliary materials workshop covers an area of 1,294 square meters, while the production area measures nearly 18,950 square meters. Additionally, the office area is approximately 2,856 square meters, which includes Worker accommodation, parking lots, warehouses, canteens, and staff activity rooms.

### MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Low	MEDIUM
PERFORMANCE	Medium	Medium	Low	MEDIUM
OVERALL		MED	IUM	

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a list of Applicable Laws, regulations, and other requirements for environmental and Occupational Health and Safety topics, which is updated monthly. The Entity conducts regular Compliance evaluations, with the most recent evaluation in July 2024. The evaluation confirmed that the Entity could comply with legal requirements. It is confirmed on the Institute of Public & Environmental Affairs (IPE) website (ipe.org.cn) that there is no record of violation by the Entity.
1.2 Anti-Corruption	Conformance	The Entity has identified anti-Bribery laws and regulations and has conducted an anti-Bribery risk assessment. All employees identified as working in sensitive roles have received training on Corruption and Bribery. All suppliers are required to sign an agreement aimed at preventing Corruption. A global whistleblowing hotline has been established, available at: http://www.lizhong.com.cn/article/show/300.html
1.3a-e Code of Conduct	Conformance	The Entity has established the ASI Performance Standard Manual, which addresses environmental, social, and governance performance. The General Manager has approved the Entity's Code of Conduct (page 15), which is disclosed on the Entity's website: http://www.lizhong.com.cn/article/show/305.html
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established an ASI Management System Policy (page 9) that addresses environmental, social, and governance practices, available at: http://www.lizhong.com.cn/article/show/305.html The General Manager has approved the Policy, and it has been integrated into business operations and monitored via internal audits. The Policy is reviewed annually during management review.
2.2a-c Leadership	Conformance	The Entity has appointed the Vice Manager as the Management Representative, and their responsibilities have been clearly defined and communicated to employees. The Entity also provides the necessary resources for implementing the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System, and the latest surveillance audit report was reviewed. All the findings have been followed up and closed out. An internal audit and management review have been conducted.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and implemented a Social Management System according to SA8000 to manage risks with respect to Human Rights and Labour Rights. An internal audit and management review have been conducted.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy, which has been approved by the General Manager. A Due Diligence management regulation has been established to assess suppliers. This Policy has been communicated to suppliers through an

CRITERION	RATING	COMMENT
		agreement. Additionally, the risks associated with suppliers are evaluated. The Responsible Procurement Policy is publicly disclosed at: http://www.lizhong.com.cn/article/show/314.html
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 joined ASI.
		However, the 2006 Environmental Impact Assessment Report is available at: http://www.lizhong.com.cn/article/show/383.html
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities.
		However, the Entity's Human Rights Impact Assessment Report is available at: http://www.lizhong.com.cn/article/show/388.html
2.7a-f Emergency Response Plan	Conformance	The Entity prepared the Environmental Emergency Response Plan and Work Safety Response Plan. All their emergency plans are filed with the local government.
		The Emergency Response Plan for Chemical Leakages is available at: http://www.lizhong.com.cn/article/show/320.html
		The Emergency Response Plans for Liquid Aluminium and natural gas Leakages are available at: <u>http://www.lizhong.com.cn/article/show/318.html</u>
		http://www.lizhong.com.cn/article/show/316.html
2.8a-d Suspended Operations	Conformance	The Entity has established a Suspended Operations management regulation. It specifies the Business Resilience Plan to mitigate the adverse impacts to environmental, social and governance areas. The Entity's ASI PS Management Manual specifies that the Business Resilience Plan must be reviewed every five years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a system to manage mergers and acquisitions, which stipulates measures to mitigate the impacts on the Affected Populations before and after mergers and acquisitions, and the Due Diligence to be conducted before any merger or acquisition. At present, there are no planned mergers or acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established Closure, Decommissioning and Divestment Management Regulations, which stipulates the environmental, social, and governance practices that should be considered during the planning phase of closure, retirement, and divestment. At present, there are no planned closures, retirements, or divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared and disclosed the 2023 ESG Sustainability Report with reference to Global Reporting Initiative (GRI), available at: http://www.lizhong.com.cn/article/show/385.html
3.2 Non-compliance and Liabilities	Conformance	According to Credit China (https://www.creditchina.gov.cn), the Entity does not have any records of any penalties.

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	The Entity's 2023 financial statements were audited and reported on by an independent third party. The audit report disclosed the payments made to the government (i.e. taxes, and social insurance fees). The payments to the government are disclosed at: http://www.lizhong.com.cn/article/show/392.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established an adequate and effective Stakeholders (e.g. Worker/community, supplier, and customer) communication process to address complaints, grievances, and requests for information. The Entity reviews the Complaints Resolution Mechanism annually, and is available at: http://www.lizhong.com.cn/article/show/300.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established a Life Cycle Assessment (LCA) management system. The Entity has issued the LCA Report for the AC4C Aluminium alloy ingots production process (adapted data from China Product Life Cycle Greenhouse Gases (GHG) Emissions 2022, developed by the Environmental Planning Institute of the Ministry of Ecology and Environment, Beijing Normal University, Sun Yat-sen University, China Urban GHG Working Group, and Ecoinvent v3.9.1.).
		The LCA Report is available at: http://www.lizhong.com.cn/article/show/384.html
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has evaluated the life cycle impacts of its major Product line for which Aluminium is used. The Entity can provide adequate cradle- to-gate LCA information on its Aluminium Products upon request by customers.
		The LCA Assessment Report is available at: http://www.lizhong.com.cn/article/show/384.html
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 Entity has established objectives for managing the process of Scrap recycling. The objectives and targets are reviewed monthly. The Entity has implemented a procedure for the classification and disposal of the different types of Aluminium Scrap. Scrap is recycled, and records are maintained to monitor recycling rates.
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	The Entity has signed waste collection and recycling contracts with an Aluminium waste collection agency to improve the recycling rate of the Entity's Aluminium-containing products in relevant markets. In addition, the Entity has established an End of Life product recycling plan for 2024 and followed up the achievement of the plan.

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has prepared a 2023 Greenhouse Gas (GHG) Emissions Inventory Report. A qualified Third Party has undertaken a verification of the Entity's GHG emissions. The calculations for GHG emissions and energy are made according to ISO 14064-1:2018.
		The Greenhouse Gas Emissions Inventory Report is available at: http://www.lizhong.com.cn/article/show/313.html
		The GHG emissions data verification statement is disclosed at http://www.lizhong.com.cn/article/show/307.html
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	Conformance	The Entity has established a GHG Emissions Reduction Plan, which includes Direct and Indirect GHG emissions: http://www.lizhong.com.cn/article/show/386.html
		The GHG Emissions Reduction Pathway is consistent with a 1.5°C scenario and includes both Intermediate Targets and a 2050 target developed with the ASI methodology. The baseline is the GHG emission data of 2023. The Reduction Plan covers Direct emissions (Scope 1 and Scope 2) and Indirect emissions (Scope 3, category 1).
		The Entity has defined the timelines and measures to achieve the targets in the Reduction Plan. The measures include the use of recycled scrap, process improvements, and equipment optimisation. The implementation of the Plan will be reviewed annually.
5.4 GHG Emissions Management	Conformance	The Entity has established procedures to enable GHG emissions management performance as outlined in the GHG Emission Reduction Plan and achieve its GHG emissions reduction targets. In addition, a Digital Carbon Management Platform (DCMP) has been established to manage carbon emissions and collect basic data on carbon emissions monthly, and the DCMP will generate the results of carbon emissions and then follow up on the trend of carbon emissions.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	All Emissions to Air are measured by a third party quarterly according to legal requirements, and all pollutant factors comply with regulatory standards. In addition, an online monitoring facility has been used to monitor pollutants such as particulate matter, sulphur dioxide, and nitrogen oxides, and the results are reported to the government.
		The Entity has established Waste air emissions reduction plans, and air emissions are monitored monthly, and records are maintained. The waste air emissions are disclosed in the 2023 ESG Sustainability Report, page 44: <u>http://www.lizhong.com.cn/article/show/385.html</u>
		The waste air Pollutant emissions and emission reduction plan is available at: http://www.lizhong.com.cn/article/show/380.html

CRITERION	RATING	COMMENT
6.2a-g Discharges to Waters	Conformance	The Entity has implemented a water-saving procedure. There is no wastewater discharged from production, the industrial water is recycled on-site. Only domestic wastewater is discharged from the Entity into the municipal drainage system for disposal. Domestic wastewater is tested annually by a third party, and the discharge meets legal requirements.
		Wastewater discharge is disclosed in the 2023 ESG Sustainability Report, page 46: <u>http://www.lizhong.com.cn/article/show/385.html</u>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity conducts an annual evaluation of potential Spills and Leakage risks. The main risks of potential Spills and Leakages include natural gas leaks, waste air leaks, chemical Spills, and liquid Aluminium Spills. Emergency response plans have been implemented to prevent, detect, and remediate any Spills and Leakages.
		The Emergency Response Plan for chemical leaks is disclosed at: http://www.lizhong.com.cn/article/show/320.html
		The Emergency Response Plan for Natural Gas Leakage is disclosed at: http://www.lizhong.com.cn/article/show/318.html
		The Emergency Response Plan for Liquid Aluminium Leakage is disclosed at: http://www.lizhong.com.cn/article/show/316.html
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has prepared an Emergency Plan for Environmental Incidents, which specifies that in the event of Leakage, the responsible persons in the surrounding villages must be notified and informed of the potential impact. The Entity has retained the contact list of Stakeholders.
		The Entity's Leakage Risk Assessment determined that there were no Leakages in 2023, as disclosed in the 2023 ESG Sustainability Report, pages 48-51: http://www.lizhong.com.cn/article/show/385.html
6.5a-c Waste Management and Reporting	Minor Non- Conformance	The Entity has developed procedures to control waste and publicly discloses the quantity of Hazardous Waste and Non-Hazardous Waste generated, including waste treatment methods in the Guangdong Solid Waste Supervision Information Platform annually.
		The Entity has established a digital platform to monitor the collection and disposal of all wastes. Waste discharge is disclosed in the 2023 ESG Sustainability Report, 48-51: http://www.lizhong.com.cn/article/show/385.html
		However, it was identified the Entity has not established a waste management strategy and related waste reduction targets.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has a facility to separate the Aluminium and Dross from the Aluminium ash slag to improve the quality of the Dross. The secondary Aluminium ash is stored in a dedicated area and labelled. The floor is designed with waterproof and anti-Leakage measures to prevent the release of hazardous substances into the environment. The Aluminium slag residue is legally transferred and disposed of by a qualified third party as Hazardous Waste. No Dross residues are landfilled.

CRITERION	RATING	COMMENT
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has mapped its water capture and use by source and type. The water resource consumption assessment report showed that domestic water consumption is within the permitted limit, and industrial water is reused, with no wastewater discharge. The Entity has evaluated and annually disclosed the risks related to water in the Entity's Area of Influence, which are considered low.
		The Water Consumption Risk Assessment Report has been disclosed at: http://www.lizhong.com.cn/article/show/389.html
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water resource risk assessment determined the risks as low.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and Materiality of Biodiversity from the land use and activities in the Entity's Area of Influence. The Entity prepared a Biodiversity Assessment Report based on the data from the Biodiversity Impact Assessment Tool ( <u>https://bia.hinature.cn</u> ). The Report showed the Biodiversity Impact is low.
		The 2024 Biodiversity Assessment Report is disclosed at: http://www.lizhong.com.cn/article/show/299.html
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, based on the assessment results, the impact of the Entity on Ecosystem Services is low, and no Priority Ecosystem Services impacts have been identified.
8.4 Alien Species	Conformance	The Entity has developed a Biodiversity Assessment Report that evaluates the potential for both accidental and intentional introductions of Alien Species. It has assessed the risks Alien Species may cause and developed measures for mitigating those risks. The Entity is committed to proactively preventing the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. To date, no Alien Species have been introduced. Refer to the 2024 Biodiversity Assessment Report: http://www.lizhong.com.cn/article/show/299.html
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located in a government-designated industrial zone and has committed not to explore or build New Projects in World Heritage Properties as documented in the control procedure for new, altered and expanded projects. The Entity has reviewed a World Heritage Properties list for China, and there are no protected cultural relics, world heritage sites, or other scenic spots near the Entity.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	The Entity is located in a government-designated industrial zone and has committed not to explore or build New Projects in Protected Areas. The Entity developed an Environmental Impact Assessment Report, which confirms there are no Protected Areas around the Entity.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a corporate Human Right impact commitment, including a Policy commitment to respect Human Rights and a gender-responsive Policy. The Policy is communicated to employees through training. It is published on the Entity's website and posted on-site: <u>http://www.lizhong.com.cn/article/show/310.html</u>
		The Entity has established a procedure to define how to identify any Material Legacy Impacts in the Entity's operations and business relationships established through products or services. The Entity conducted Human Rights Due Diligence on four nearby residents and found no negative findings.
		A Human Rights Due Diligence Report has been prepared, including Due Diligence on internal Human Rights, affected peoples, and suppliers. The Entity reviews the Human Rights Policy every three years. The Human Rights Impact Assessment Report has been disclosed at: http://www.lizhong.com.cn/article/show/311.html
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established procedures to protect women's rights and promote gender equality. A dedicated breastfeeding room is available for employees. All female Workers have the right to paid pregnancy leave, parental leave, and feeding leave. Training sessions have been conducted to educate female employees about preventing sexual harassment and Discrimination in the workplace. Additionally, a grievance and complaints mechanism are in place, allowing women to raise concerns, and it is publicised in both the canteen and the workshop.
		The Entity reviews its gender equality and women's rights program every five years or whenever there are changes or deficiencies identified. The results of the measures taken to protect the rights and interests of women employees are publicly disclosed in the Sustainability Report, chapter 5, page 61: <u>http://www.lizhong.com.cn/article/show/385.html</u>
		Based on interviews with female Workers, the Entity guarantees women's rights and there are no reports of Discrimination, violence, or harassment.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the Entity's Area of Influence.
		However, the Entity has established procedures to ensure respect for the customs, rights, and interests of local residents in the region.

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated since becoming an ASI member.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated since becoming an ASI member.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is committed to protecting cultural and sacred heritage. The Entity is located within an industrial park developed by the local government and no cultural and sacred heritage locations are present within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites that are affected by the Entity's operations. Furthermore, there are no Indigenous Peoples located within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects and Major Changes initiated since the Entity joined ASI, nor activities that would cause displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity conducted a Stakeholder needs assessment to identify potential impacts and implement corresponding measures regarding health and safety, social and cultural aspects, Human Rights, and environmental factors resulting from its activities. The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. Action plans have been developed to support different activities, for instance, recruiting employees from local communities, supporting persons with physical disabilities, and tree planting for local communities. Further information is available in the 2023 ESG Sustainability Report, pages 78, 79 and 80: http://www.lizhong.com.cn/article/show/385.html
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established and implemented a Conflict Mineral Management Regulation, Due Diligence Management Regulation, and Responsible Sourcing Policy regarding supply chain Due Diligence. The Entity has exercised risk-based Aluminium supply chain Due Diligence and requires suppliers to sign the Conflict Mineral Commitment.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Conflict Mineral Management Regulation and maintains records of their supplier risk assessments. All raw Aluminium is produced and supplied from within China. The risk assessment results indicate no risks of armed conflict or Human Rights violations in the Entity's supply chain.

RATING	COMMENT
Not Applicable	This Criterion is not applicable to the Entity, as the internal assessment determined that no materials have been sourced from CAHRAs. However, a strategy has been established to respond to identified risks, if they are identified in future.
Conformance	The ASI Audit provided an independent third-party assessment of the Entity's Due Diligence practices. In addition, the Entity has conducted Due Diligence monitoring in accordance with the OECD Due Diligence Guidance for Minerals in its Aluminium supply chain.
Conformance	The Entity has prepared an annual supply chain Due Diligence report. The 2023 ESG Sustainability Report discloses the latest report, pages 31- 32: <u>http://www.lizhong.com.cn/article/show/385.html</u> Based on the report, no materials have been sourced from CAHRAs.
Conformance	The Entity's security team is from a licensed security agency. All security guards hold a Security Guard Certificate, and each security guard has signed a commitment to respect Human Rights. The Entity has developed and implemented standard operating instructions that define the management of security personnel. Security personnel receive training to ensure their understanding of their mandate and to respect Human Rights. To date, no complaints regarding the security practices have been received.
Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China regarding Freedom of Association and Collective Bargaining. Additionally, the Entity has a Policy respecting Freedom of Association and has implemented an employee representative committee and employee representatives are freely elected by employees.
Conformance	The Entity's senior management has committed to respect the right of Freedom of Association and Collective Bargaining. The Entity respects the rights of employees to freely associate, to join or not join Trade Unions, seek representation, and join employee committees in accordance with the law. A Trade Union was established in January 2024, however, there is no Collective Bargaining Agreement at the Entity. Worker representatives were freely elected by Workers.
Conformance	The Entity has established Child Labour and juvenile labour protection regulations, which define the prohibition of Child Labour and the protection of juvenile labour. For example, juvenile Workers will not be exposed to hazardous working environments. The youngest worker at the Entity is 20 years old.
Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in Chinese labour laws and ILO Conventions. The Entity's Human Rights Impact Commitment outlines this commitment, which applies to all Workers:
	Not Applicable Conformance Conformance Conformance Conformance Conformance

CRITERION	RATING	COMMENT
		Worker interviews confirmed that Overtime is voluntary, and the Workers can terminate their employment with one-month advance notice.
10.4a-c Non-Discrimination	Conformance	The Entity promotes a culture of non-Discrimination in its hiring, salary, promotion, and training processes, as outlined in its Human Rights Policy. This document ensures equal opportunities for all individuals, free from Discrimination. Payroll records reviewed during the Audit confirm that all Workers, regardless of gender, receive fair compensation based on their position and the work performed. Discrimination is covered in the Entity's Human Rights Impact
		Commitment (http://www.lizhong.com.cn/article/show/387.html) and in the 2023 ESG Sustainability Report (chapter 5) (http://www.lizhong.com.cn/article/show/385.html).
		Any employee, manager, or third party who is aware of or suspects a potential violation related to Discrimination can contact their supervisor. Additionally, complaints can be submitted through the designated website, by telephone, or the grievance or complaints channel: <u>http://www.lizhong.com.cn/article/show/300.html</u>
10.5 Communication and engagement	Conformance	The Entity has demonstrated that it ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of labour and compensation issues, without the threat of reprisal, intimidation, or Harassment. The Entity has conducted employee satisfaction surveys and implemented their continuous improvement proposal plans. Employees can raise concerns, suggestions, complaints, or improvement items via a continuous improvement proposal plan. The grievance or complaints channel is available at: http://www.lizhong.com.cn/article/show/300.html
10.6a-g Violence and Harassment	Conformance	The Entity has developed a Violence and Harassment Management Regulation and implemented it in consultation with Workers and their representatives, which sets out the policies for preventing Violence and Harassment in the workplace, as well as complaints and mechanisms for dealing with Violence and Harassment when they occur. The Entity identifies social responsibility risks, including the risk of Harassment, corporal punishment of employees, and abuse. Based on Workers' interviews, there have been no incidents of Violence or Harassment.
10.7a-c Remuneration	Minor Non- Conformance	The Entity has established a salary management regulation. Wages are transferred to employees before the 20th of every month. Workers have confirmed that salaries are paid in a timely manner. Employees are entitled to paid leave, and social insurance is provided for all employees.
		However, it was identified some Workers who worked during a national holiday period (Mid-Autumn Festival) received their normal wages and not the Overtime premium of at least 300% as per the regulatory requirement for statutory holidays.
10.8a-c Working Time	Minor Non- Conformance	Working hours, including Overtime, are recorded manually, and monitored. All Workers receive at least one day off per week.
		However, it was identified during the Audit that in September 2024, Overtime working hours for some Workers ranged between 40 to 72

CRITERION	RATING	COMMENT
		hours, which exceeds the legal limit of thirty-six Overtime hours per month.
10.9a-b Informing Workers of Rights	Conformance	The Entity has demonstrated that it guarantees open communication and direct engagement with Workers and their representatives on working conditions, rights and protections and the resolution of labour and compensation issues, without threat of reprisal. Employees are informed of their rights during pre-job training. A Trade Union is present, and all employees are informed of the right to join or not join the Trade Union without restrictions.
11. OCCUPATIONAL HEALTH A	ND 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.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has established and documented OH&S objectives and targets, including leading and lagging indicators as part of their OH&S program. The Entity's OH&S performance is monitored monthly, and the management review is conducted annually. The Entity has disclosed its OH&S performance in the 2023 ESG Report 2023, page 79: http://www.lizhong.com.cn/article/show/385.html
		The comparative analyses of performance with peer businesses and leading practices are available at: www.lizhong.com.cn/article/show/425.html
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system for Workers' consultation and participation in OH&S in accordance with the requirements of ISO 45001:2018. Workers are encouraged to report their concerns, advice or proposals on OH&S issues which are reviewed by management. The Entity maintains an official communications channel to receive reports of behaviour that violates the OH&S Policy or OH&S guidelines, as well as violations of laws and regulations.

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	15 January 2025	Initial Certification Audit – Full Certification