

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# CITIC Dicastal Co., Ltd.

CERTIFICATE NUMBER  
**407**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3 2022)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**SGS-CSTC STANDARDS  
TECHNICAL SERVICES**

DATE OF ISSUE  
**23 JANUARY 2025**

DATE OF EXPIRY  
**22 JANUARY 2028**

CERTIFIED SINCE  
**23 JANUARY 2025**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Design and manufacture of  
Aluminium alloy wheels at the East  
Plant and Headquarters Plant,  
located in Qinhuangdao, China.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	CITIC Dicastal Co., Ltd.
ENTITY NAME	CITIC Dicastal Co., Ltd.
CERTIFICATION SCOPE	Design and manufacture of Aluminium alloy wheels at the East Plant and Headquarters Plant, located in Qinhuangdao, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>18 – 20 September 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>15 October 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the design and manufacture of Aluminium alloy wheels at the East Plant and Headquarters Plant, both Facilities located in Qinhuangdao, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion</li></ul> <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	23 January 2025 – 22 January 2028
NEXT AUDIT TYPE	Surveillance Audit

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NEXT AUDIT DATE 22 July 2026

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CERTIFICATE NUMBER 407

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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.

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## ENTITY OVERVIEW

The Entity consists of two Facilities in China, including both the East Plant and the Headquarters Plant. The Entity's Aluminium alloy wheel products are sold to carmakers in China, the United States, Europe, South Korea, and Japan.

The East Plant, located in an industrial park in Haigang District, Qinhuangdao, commenced operation in 1988 and has approximately 910 employees. The Facility covers an area of approximately 13 hectares, and includes a casting line, office building, warehouse (raw materials, products, hazardous wastes, Aluminium dross), a wastewater treatment plant, gas treatment facilities, and utility facilities. The main processes at the East Plant include casting, heat treatment, machining, painting and packaging. The current annual production of Aluminium alloy wheels is approximately 3.4 million units.

The Headquarters Plant, located in the Economic and Technological Development Zone, Qinhuangdao, commenced operation in 2012 and has approximately 3,330 employees. The Facility covers an area over 30 hectares, and includes two casting lines, a forging line, a moulding centre, an R&D workshop, a surface engineering centre, an office building, a warehouse (raw materials, products, hazardous wastes, Aluminium dross), an employee dormitory, wastewater treatment plant, gas treatment facilities, utility facilities. The main processes at the Headquarters Plant include casting, forging heat treatment, machining, painting and packaging. The current annual production of Aluminium alloy wheels is approximately seven million units. The Entity's main office building is located at the Headquarters Plant site.

The Entity's key external Stakeholders include government agencies at all levels, industrial associations, customers, and suppliers. Since 2023, two technological renovation projects have been completed. No new construction works are currently planned for the future.

## 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
<b>SYSTEMS</b>	Medium	High	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	High	Medium	MEDIUM
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established procedures for monitoring changes in Applicable Law, communicating the implications of the changes, and regularly evaluating Compliance with Applicable Law. New or updated legal and other requirements are sent to responsible departments for review and evaluation. Compliance evaluation is conducted at least annually. There is no Customary Law in this region.</p> <p>However, in the list and evaluation form, agreements with customers, requirements of industry associations are not included (such as China Association of Automobile Manufacturers, China Nonferrous Metals Industry Association, Aluminium Wheel Quality Association, etc.), Environmental, Health and Safety (EHS) protocol requirements from major customers, and requirements from the parent company.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established Policies that cover business ethics, which were approved by the General Manager. The Entity has established an Anti-Corruption and anti-Bribery control procedure, identifying key positions with a high risk of Corruption and Bribery. Material suppliers must sign an agreement and the Entity's Integrity Commitment Letter for Key Position Personnel.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed an ASI Code of Conduct has training on the Code and is provided to employees:  <a href="https://www.dicastal.com/Public/sdsc/15.pdf">https://www.dicastal.com/Public/sdsc/15.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established Policies, addressing Environmental, Social, Governance, Responsible Sourcing, Labour and Business Ethics, and Energy, the General Manager approved the Quality Policies. Employees are trained on these Policies at the start of their employment and on an annual basis. The Policies are reviewed at an annual management review by top management.</p>
2.2a-c Leadership	Conformance	<p>The Vice General Manager is appointed as the ASI Management Representative. Communication with senior management regarding the implementation of the ASI system occurs at monthly management meetings.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has established an ISO 14001:2015 certified Environmental Management System.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has established an Environmental Management System and an Occupational Health and Safety (OH&amp;S) Management System. Additionally, the Entity has developed a series of procedural documents related to the Entity's Social Management System.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a Responsible Sourcing Policy, approved by the General Manager. The Policy is available at:  <a href="https://www.dicastal.com/Public/sdsc/6.pdf">https://www.dicastal.com/Public/sdsc/6.pdf</a></p>

CRITERION	RATING	COMMENT
		The Entity periodically conducts Due Diligence assessments on their suppliers and conducts risk evaluations.
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has established an environmental and Social Impact Management Plan to identify, prevent, monitor, mitigate, and articulate the significant impacts on the environment and society caused by Major Changes and for new or existing projects.</p> <p>Environmental and social impact management plan: <a href="https://www.dicastal.com/Public/sdsc/26.pdf">https://www.dicastal.com/Public/sdsc/26.pdf</a></p> <p>The Entity has conducted Environmental Impact Assessments for new, renovated, and expanded projects, and conducted completion of environmental protection acceptance. These projects included the upgrade and renovation of the existing factory building to increase production capacity through the addition of key equipment and adjusting processes and melting furnace renewal and reconstruction.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity's Human Rights Policies was approved by the General Manager, refer to: <a href="https://www.dicastal.com/Public/sdsc/31.pdf">https://www.dicastal.com/Public/sdsc/31.pdf</a></p> <p>The Entity has established an Environmental and Social Impact Management Plan and has conducted an assessment on social and Human Rights impacts related to new construction, expansion, and renovation projects including the upgrade and renovation of the existing factory building and the melting furnace renewal and reconstruction.</p> <p>Environmental and social impact management plan is available at: <a href="https://www.dicastal.com/Public/sdsc/26.pdf">https://www.dicastal.com/Public/sdsc/26.pdf</a>.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan for Production Safety Accidents and an Emergency Response Plan for sudden environmental incidents. Emergency drills are held at least annually, and re-evaluations and revisions to the Plan are conducted every three years. The summary of the Emergency Response Plan is available at: <a href="https://www.dicastal.com/Public/sdsc/25.pdf">https://www.dicastal.com/Public/sdsc/25.pdf</a>
2.8a-d Suspended Operations	Conformance	The Entity has established an Investment Management System and guidelines for Mergers and Acquisitions Management. The Entity has not suspended any operations since they joined ASI.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established an Investment Management System and guidelines for Mergers and Acquisitions Management. The Entity does not have any planned mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established an Investment Management System and guidelines for Closing, Stopping Production, and Exiting Work. The Entity does not have any closure, decommissioning or divestment activities proposed.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared their Annual ESG Report in accordance with the Sustainable Development Reporting Standards (i.e. GRI Standards), and the China Corporate Social Responsibility Reporting Guidelines. The Report is available at: <a href="https://www.dicastal.com/Public/sdsc/14.pdf">https://www.dicastal.com/Public/sdsc/14.pdf</a>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	<p>The National Enterprise Credit Information Publicity System confirmed that the Entity has had not any material fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law. This information is available at (login required): <a href="https://shiming.gsxt.gov.cn">https://shiming.gsxt.gov.cn</a></p> <p>The Entity will disclose Material fines and non-monetary sanctions in Annual ESG Report if and when they occur.</p>
3.3a-c Payments to Governments	Minor Non-Conformance	<p>The Entity's payments to governments include various tax, water and electricity fee and insurance premiums for employees.</p> <p>Even though the Entity has made payments to Governments on a legal and/or contractual basis, these have not been publicly disclosed.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established Feedback Management Procedure which includes the communication channels including email and phone number, available at: <a href="https://www.dicastal.com/Public/sdsc/2.pdf">https://www.dicastal.com/Public/sdsc/2.pdf</a></p> <p>No complaints or grievances received since the Entity joined ASI.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has established a Product Lifecycle Management Procedure and developed a research report on the Life Cycle ('cradle-to-gate') of Aluminium Alloy Wheels, available at: <a href="https://www.dicastal.com/Public/sdsc/28.pdf">https://www.dicastal.com/Public/sdsc/28.pdf</a></p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has developed a research report on the Life Cycle (cradle-to-gate) (May 2024) of Aluminium Alloy Wheels, available at: <a href="https://www.dicastal.com/Public/sdsc/28.pdf">https://www.dicastal.com/Public/sdsc/28.pdf</a></p>
4.2 Product Design	Conformance	<p>The Entity has developed and implemented a 'New Product Development and Management Process' for Aluminium Alloy Wheels which includes the principles of lightweight design, optimising structural design, reducing manufacturing costs, selecting suitable Aluminium alloy materials and through the use of more environmentally responsible materials.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity only uses one type of Aluminium alloy ingots as raw material for casting, the product processing Scrap and scrapped defective products, with the same composition of the ingots, can be re-added in a limited proportion to the melting casting process, as a result no grading or separation is needed.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has established a five-Year Development Plan for Recycled Aluminium from 2024 to 2028, refer to: <a href="https://www.dicastal.com/Public/sdsc/22.pdf">https://www.dicastal.com/Public/sdsc/22.pdf</a></p> <p>The proportion of Recycled Aluminium used by the Entity will increase to 15%, and by 2030, the proportion of Recycled Aluminium used by the Entity will reach between 20 and 25 percent. A recycled Aluminium Project Department in Engineering Technology Research Institute has also been established.</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has established a five-Year Development Plan for Recycled Aluminium from 2024 to 2028, available at: <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F22.doc&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F22.doc&amp;wdOrigin=BROWSELINK</a></p> <p>The Entity is sourcing more and more Aluminium alloy ingots from such re-melting/refining supplier who use Recycled Aluminium as raw materials. In China, almost all Scrap products containing Aluminium return into national collection and recycling systems, where they are disassembled and classified. Some re-melting/refining companies used Recycled Aluminium as raw material.</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has disclosed its Scopes 1, 2 and 3 Greenhouse Gas (GHG) emissions and also obtained ISO 14064-1 – Verification declaration of GHG emissions for 2023, available at: <a href="https://www.dicastal.com/Public/sdsc/102.pdf">https://www.dicastal.com/Public/sdsc/102.pdf</a></p> <p>A GHG verification report has been issued by WIT in 2024, refer to: <a href="https://www.dicastal.com/Public/sdsc/21.pdf">https://www.dicastal.com/Public/sdsc/21.pdf</a></p> <p>Energy data are reported to the Qinhuangdao Municipal Government every quarter, and the energy consumption from January to September 2024 is available at: <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F21.docx&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F21.docx&amp;wdOrigin=BROWSELINK</a></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	Conformance	<p>The Entity has established a decarbonisation pathway as disclosed in the 2023 ESG Report, page 57: <a href="https://www.dicastal.com/Public/sdsc/14.pdf">https://www.dicastal.com/Public/sdsc/14.pdf</a></p> <p>The carbon reduction progress is monitored monthly and analysed routinely.</p> <p>The Entity has established a GHG Emissions Reduction Plan for 2023-2028 and a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario using the ASI Methodology, including an Intermediate target covering a period no greater than five years. <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F41.docx&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F41.docx&amp;wdOrigin=BROWSELINK</a></p> <p>The Entity has established a Management Measures for Greenhouse Gas Emissions procedure, which requires an annual review of the GHG Emissions Reduction Plan and annually discloses the GHG Emission Reduction progress.</p> <p>The Entity has planned and implemented a series of emission reduction actions, including the purchasing of 'green' Aluminium, using more Recycled Aluminium, furnace renovation plans to build a 300,000 tonne per annum 'green' electrolytic Aluminium production</p>



CRITERION	RATING	COMMENT
		line, and purchasing green electricity. <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F42.doc&amp;wdOrigin=BROUSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F42.doc&amp;wdOrigin=BROUSELINK</a>
5.4 GHG Emissions Management	Conformance	The Entity has established an ISO 50001:2018 certified Energy Management System and implemented a Carbon Emissions and Ecological Environment Reduction Management Plan which includes monthly monitoring and analyses of GHG emissions.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has disclosed its report on the Implementation of the Pollutant Discharge Permit, as required by the Government. An annual monitoring plan for pollutant discharge has been established and is periodically implemented by a third-party testing Contractor. The test results for 2024 did not exceed any established standards.  Additionally, an emission reduction plan for 2024 has been created, addressing NOx, SO <sub>2</sub> , particulate matter, and Non Methane Hydrocarbons (NMHCs), available at: <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F34.xlsx&amp;wdOrigin=BROUSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F34.xlsx&amp;wdOrigin=BROUSELINK</a>
6.2a-g Discharges to Water	Conformance	A report on the Implementation of Pollutant Discharge Permit in 2023 was disclosed as required by the Government. An annual monitoring plan for pollutant discharge has been established and is implemented periodically by the third-party test Contractor. The test results for 2024 did not exceed any standards. The Emissions reduction plan 2024 has been established and addresses Chemical Oxygen Demand (COD) and Ammonia Nitrogen (NH <sub>3</sub> -N), and is available at: <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F34.xls&amp;wdOrigin=BROUSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dicastal.com%2FPublic%2Fsdsc%2F34.xls&amp;wdOrigin=BROUSELINK</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted a risk assessment report for sudden environmental incidents, including an annual Soil Hazard Investigation Report for both the HQ and East Plant. Each facility conducts quarterly rainwater outlet inspections to ensure that no sewage or Hazardous Waste flows into stormwater. Emergency preparedness and response drills have been planned and implemented.  Spills Management Procedure: <a href="https://www.dicastal.com/Public/sdsc/24.pdf">https://www.dicastal.com/Public/sdsc/24.pdf</a>  Anti-leakage management program: <a href="https://www.dicastal.com/Public/sdsc/16.pdf">https://www.dicastal.com/Public/sdsc/16.pdf</a>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	No Spills or Leakages have occurred at the Entity, and any Leakages are disclosed through Hebei Enterprise Environmental Information Disclosure System according to regulation which requires companies to disclosed information on any environmental accidents. No Leakages occurred in 2023 and 2024.
6.5a-c Waste Management and Reporting	Conformance	The total amount of Hazardous Waste from both the HQ and the East plant is below the pollutant discharge permit. All Hazardous Waste has been transferred to a qualified Hazardous Waste company.  The Entity has quantify and publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated from its activities, for

CRITERION	RATING	COMMENT
		<p>HQ:  <a href="https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=gebtxxgkContent&amp;dataid=f2d837a0b8f64a75bf47665a897a48bd">https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=gebtxxgkContent&amp;dataid=f2d837a0b8f64a75bf47665a897a48bd</a>) and  for East  Plant:<a href="https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=e9e3c93d61024eeebc3096af565cbdf1">https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=e9e3c93d61024eeebc3096af565cbdf1</a>)</p> <p>A Hazardous Waste reduction plan 2024 has been established, and most Hazardous Wastes are treated by either burning or landfilling.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has established a management procedure for the storage, transfer, and disposal of Aluminium ash residue. Aluminium Dross is stored in a dedicated warehouse. An external company uses a rotary kiln to convert Aluminium ash into calcium aluminate for use as building materials.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified, documented, and publicly disclosed its water withdrawal and use by source and type. The Entity has also conducted an assessment and identified potable water and surface water resources as substantial water related risks to the Watershed within the affected area. These are evaluated and publicly disclosed Material water-related risks in Watersheds in the Entity's Area of Influence.</p> <p>The Water Balance Report for HQ is available at:  <a href="https://www.dicastal.com/Public/sdsc/19.pdf">https://www.dicastal.com/Public/sdsc/19.pdf</a></p> <p>The Water Balance Report for the East Plant at:  <a href="https://www.dicastal.com/Public/sdsc/3.pdf">https://www.dicastal.com/Public/sdsc/3.pdf</a></p>
7.2a-e Water Management	Conformance	<p>The Entity has implemented a Water Management Plan which is updated annually and includes activities such as measuring water usage, implementing rainwater and sewage separation.</p> <p>Water resources management measures:  <a href="https://www.dicastal.com/Public/sdsc/32.pdf">https://www.dicastal.com/Public/sdsc/32.pdf</a></p> <p>Water Resource Management Plan  <a href="https://www.dicastal.com/Public/sdsc/33.pdf">https://www.dicastal.com/Public/sdsc/33.pdf</a></p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has assessed the risk to, and potential impacts on Biodiversity and Ecosystem Services from land use and activities within the Entity's Area of Influence. The assessment includes geographical location, topography, engineering and hydrological addresses, climate, soil vegetation, mineral resources, social environment, and Biodiversity risk assessment, all of which were evaluated as low risk.</p> <p>Biodiversity Assessment Report:  <a href="https://www.dicastal.com/Public/sdsc/18.pdf">https://www.dicastal.com/Public/sdsc/18.pdf</a></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 there are no Material Biodiversity and Ecosystem Services risks, and the impact has been identified in the Biodiversity Risk Assessment as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks, and the impact has been identified in the Biodiversity Risk Assessment as low.  However, the Entity has Implemented a Biodiversity Action Plan with time-bound targets to address Material risks and impacts to Biodiversity and Ecosystem Services.
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. The HQ is located in Qinhuangdao Emerging Industrial Park, whilst the East Plant is in Eastern Industrial Zone of Haigang District Cluster.
8.4 Alien Species	Conformance	The Entity's Biodiversity Assessment Report demonstrated that there are no intentional or unintentional introduction of foreign organisms to the Entity, and the risk of natural introduction is extremely low. However, the Entity has specified control measures in relevant procedures, and strict adherence to these procedures required.  Biodiversity Assessment Report: <a href="https://www.dicastal.com/Public/sdsc/18.pdf">https://www.dicastal.com/Public/sdsc/18.pdf</a>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is committed to not explore or develop New Projects or make Major Changes in World Heritage Properties and has developed procedures for the Protection and Management of Cultural Sites and Religious Holy Sites, available at: <a href="https://www.dicastal.com/Public/sdsc/1.pdf">https://www.dicastal.com/Public/sdsc/1.pdf</a>
8.6a-d Protected Areas	Not Applicable	This Criteria is not applicable to the Entity, as the HQ is located within the Qinhuangdao Emerging Industrial Park and the East Plant is within the Eastern Industrial Zone of Haigang District Cluster 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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented a Human Rights Policy as well as a Human Rights Due Diligence management procedure which is reviewed every five years. An employee Due Diligence record and a Human Rights Due Diligence Report were conducted, which included the surrounding residents, suppliers, and outsourcing companies. It was identified the Entity did not contribute to any Human Rights violations.  Human Rights Policy: <a href="https://www.dicastal.com/Public/sdsc/31.pdf">https://www.dicastal.com/Public/sdsc/31.pdf</a>
9.2a-e Gender Equity and Women's Empowerment	Conformance	To address gender issues, the Entity has established procedures for the protection and management of women. The Entity offers equal pay for equal work and does not have gender restrictions in

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		<p>recruitment. To further support gender equality, the Labour Union has designated a women's care room to address gender Discrimination and violations of women's rights. The gender ratios within the Entity are as follows:</p> <ul style="list-style-type: none"> <li>-Senior management: 9 men to 2 women</li> <li>- Middle management: 27 men to 8 women</li> <li>- Overall employee base: 100 men to 11 women</li> </ul> <p>More information on the measures taken to promote gender equity is available at: <a href="https://www.dicastal.com/Public/sdsc/30.pdf">https://www.dicastal.com/Public/sdsc/30.pdf</a></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. Both sites are located within Industrial Parks.</p> <p>However, the Entity has established an Indigenous Protection Management Procedure, available at: <a href="https://www.dicastal.com/Public/sdsc/35.pdf">https://www.dicastal.com/Public/sdsc/35.pdf</a></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. Both sites are located within industrial precincts.</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 in the Entity's Area of Influence. Both sites are located within industrial precincts.</p>
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	<p>The Entity has conducted Environmental Impact Assessments for renovations projects and confirmed there are no Cultural and Sacred Heritage nearby.</p> <p>However, the Entity has developed a Cultural and Sacred Heritage Protection Management Procedure, available at: <a href="https://www.dicastal.com/Public/sdsc/1.pdf">https://www.dicastal.com/Public/sdsc/1.pdf</a></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 in the Entity's Area of Influence.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity as it is located within Industrial precincts and does not have any New Projects or Major Changes that require resettlement.</p>
9.7a-h Affected Populations and Organisations	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no local residents in the Entity's Area of Influence. Both sites are located within Industrial precincts.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Minor Non-Conformance	<p>The Entity has implemented supply chain Policies and Policies for the management of Conflict-Affected and High-Risk Areas (CAHRAs) within the supply chain.</p>

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		A sampled review of Aluminium ingot suppliers revealed that the origin of the Aluminium provided by one specific supplier was not clearly stated and it was unclear whether there were any associated armed conflicts or Human Rights violations. In contrast, the sources for other Aluminium ingot suppliers were clearly documented.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented tools such as the 'Red Flag Danger Signal' to rapidly identify potential risks within its supply chain, assess the identified risks, and clarify their possible adverse effects. No significant risks were identified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has designed and implemented a risk management plan to ensure effective control of risks within the supply chain operation process; Implement risk management plan, track its performance, and continuously optimise risk management measures.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement. In addition, the Entity conducts an annual self-assessment review.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The enterprise documents stipulate that Due Diligence should be conducted at least annually and are reflected in Annual ESG Report. The Due Diligence Report for CITIC Dicastal Supply Chain is publicly disclosed at: <a href="https://www.dicastal.com/Public/sdsc/39.pdf">https://www.dicastal.com/Public/sdsc/39.pdf</a>
9.9 Security practice	Conformance	<p>The Entity's security personnel are employees and has established security management rules and regulations, which stipulate the responsibilities of security personnel and the prohibited behaviours when performing their duties.</p> <p>The Entity has developed a training plan and provided training to security personnel according to the plan, training records have been verified at Audit. There have been no cases of Human Rights violations undertaken by the security guards.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the Entity adheres to Applicable Law in China regarding Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>The Entity has developed a system of Freedom of Association for Trade Unions and procedures for managing Freedom of Association and Collective Bargaining and provided training on its implementation.</p> <p>There is a grassroots employee representatives elected in accordance with the "Regulations on Democratic Management of Enterprises in Hebei Province", and the employee representatives elect the Trade Union committee and the fund management committee. Employees can voluntarily exercise the power of Collective Bargaining through the Union chairperson or Worker representatives. The Entity also accepts employee-initiated rights protection groups, which can engage in Collective Bargaining.</p>

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10.2a Child Labour	Conformance	The Entity as implemented a management programme prohibiting the use of Child Labour and has provided training on its implementation. The youngest employee in the Entity is 19 years old, and the findings confirm there is no use of Child Labour by the relevant parties.
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented implement labour management procedure, available at: <a href="https://www.dicastal.com/Public/sdsc/7.pdf">https://www.dicastal.com/Public/sdsc/7.pdf</a></p> <p>The ASI social responsibility commitment letter includes the prohibition of employing or supporting Child Labour, the prohibition of using or not supporting any labour or contract labour, corporal punishment, imprisonment, threats, violence, and Harassment.</p> <p>The Entity's Modern Slavery Statement is available at: <a href="https://www.dicastal.com/Public/sdsc/37.pdf">https://www.dicastal.com/Public/sdsc/37.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity has implemented an anti-Discrimination management program to be able to achieve equal opportunities, equal pay for equal work, and promote a culture of non-Discrimination. On-site visits to employees confirmed that they were able to receive protection without any threats of retaliation, intimidation, or Harassment.
10.5 Communication and engagement	Conformance	The Entity has developed internal and external communication procedures, trained employees of its implementation. The anti-Discrimination program, explicitly ensures open communication and direct contact with employees and their representatives regarding working conditions and resolving workplace and compensation issues.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established an ASI Environmental Policy which addressing Violence and Harassment which is implemented after consultation with Workers and their representatives, and there have been no incidents of Violence and Harassment to date. The Policy is available at: <a href="https://www.dicastal.com/Public/sdsc/6.pdf">https://www.dicastal.com/Public/sdsc/6.pdf</a></p> <p>The Policy opposes violence and Harassment, creates a safe, respectful, and friendly working environment, and does not tolerate any form of Violence and Harassment. For any form of misconduct, the Entity will respond appropriately to rectify it.</p> <p>An annual review of the situation regarding Violence and Harassment is conducted each year. In the event of any changes or control defects in the Entity that result in substantial changes in the risk of Violence and Harassment, a review of the Policy will be conducted.</p> <p>Training on social responsibility and other ASI requirements was conducted for various departments, including identified hazards and risks of Violence and Harassment, as well as related prevention and protection measures.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has established a salary management system. The labour contract specifically outlines the salary requirements. The minimum wage in Qinhuangdao is 2,200 yuan per month, which includes insurance and medical coverage.</p> <p>According to the salary management regulations, Overtime is calculated at 1.5 times the regular hourly rate. Overtime on rest days is paid at two times the regular hourly rate and Overtime on holidays is paid at three times the regular hourly rate. Additionally, if working</p>

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		hours exceed 40 hours per week, Workers are compensated at 1.5 times their salary.
10.8a-c Working Time	Conformance	<p>The Entity has established Implement attendance management procedures. There are four shifts and three operations, each lasting eight hours per shift. Over the course of a month, there are 24 working days, with employees receiving at least one day off every seven days. This schedule ensures an average of eight hours of work per day for a period of six months. Attendance records from January to July 2024 were randomly checked and found to be accurate.</p> <p>The Entity's employees are entitled to three days of annual leave and receive one day of paid leave for each year of service, up to a maximum of 20 days of paid leave.</p>
10.9a-b Informing Workers of Rights	Conformance	The rights of employees are stipulated in the employee handbook and each department conducts training to ensure that employees understand their rights. Workers are informed and entitled to Freedom of Association and Collective Bargaining in accordance with the 'Regulations on Democratic Management of Enterprises in Hebei Province'.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an ISO 45001:2028 certified Occupational Health and Safety (OH&amp;S) Management System:  <a href="https://www.dicastal.com/Public/sdsc/11.pdf">https://www.dicastal.com/Public/sdsc/11.pdf</a></p> <p>Other OH&amp;S certificates related to their OH&amp;S Management System are available at:  <a href="https://www.dicastal.com/Public/sdsc/14.pdf">https://www.dicastal.com/Public/sdsc/14.pdf</a></p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity currently undergoes an internal audit annually and undergoes an external audit by a certification body once a year. Internal audits are increased when there are changes, such as restructuring, organisational changes, leadership changes, or changes in process facilities.</p> <p>During the annual management review, OH&amp;S system documents are reviewed, or when there are control deficiencies in the system, such as major safety accidents, management reviews will be added, and the Policy will be reviewed.</p> <p>The key performance indicators of OH&amp;S, as well as the results of performance comparison and analysis with peer companies and leading practices, are reflected in the Annual ESG Report:  <a href="https://www.dicastal.com/Public/sdsc/14.pdf">https://www.dicastal.com/Public/sdsc/14.pdf</a></p> <p>The OH&amp;S system documents stipulate that when there are signs of control defects, the OH&amp;S Policy is to be reviewed.</p> <p>In addition, the Entity has also produced a special report on the comparison of OH&amp;S with peers in the same industry, titled 'OHS and Industry Advantage Comparison', available at:  <a href="https://www.dicastal.com/Public/sdsc/40.pdf">https://www.dicastal.com/Public/sdsc/40.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a safety committee with representatives including frontline employees, who participate in hazard identification and accident handling.

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		Employee representatives participate in the management of safety accidents, and frontline employees contribute to hazard identification, evaluation, and control measures development such as hazard identification forms, and team workshops.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	23 January 2025	Initial Certification Audit - Full Certification