ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Qinhuangdao Development Zone Meilv Alloy Co.,Ltd

CERTIFICATE NUMBER

422

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

21 JANUARY 2025

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

20 JANUARY 2028

ASI ACCREDITED AUDITING FIRM

SGS-CSTC STANDARDS TECHNICAL SERVICES

CERTIFIED SINCE

21 JANUARY 2025

AUTHORISED BY

The

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

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Production of Aluminium alloys through melting, alloying, casting, and homogenisation annealing treatments at Qinhuangdao Development Zone Meilv Alloy Co., Ltd. located in Hebei Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lizhong Group			
ENTITY NAME	Qinhuangdao Development Zone Meilv Alloy Co., Ltd			
CERTIFICATION SCOPE	Production of Aluminium alloys through melting, alloying, casting, and homogenisation annealing treatments at Qinhuangdao Development Zone Meilv Alloy Co., Ltd. located in Hebei Province, China.			
SUPPLY CHAIN ACTIVITIES	CasthousesAluminium Re-melting/RefiningMaterial Conversion			
ASI STANDARD	Performance Standard V3			
AUDIT TYPE	Initial Certification Audit			
AUDIT FIRM	SGS-CSTC Standards Technical Services			
AUDIT DATE	• 22 - 24 October 2024			
AUDIT REPORT SUBMISSION	23 November 2024			
Audit Scope	The Audit Scope covered the production and manufacturing of Aluminium alloy ingots, liquid Aluminium alloy, and Aluminium alloy bars at Qinhuangdao Development Zone Meilv Alloy Co., Ltd.			
	Supply chain activities included in the audit scope:			
	 Casthouses Aluminium Re-melting/Refining Material Conversion 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	21 January 2025 - 20 January 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	21 July 2026
CERTIFICATE NUMBER	422



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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

Qinhuangdao Development Zone Aluminum Alloy Co., Ltd. (the 'Entity') was registered and established in 2001 with a registered capital of 150 million RMB and an area of 50,983 square metres. It is a technology-based enterprise engaged in the processing, production and manufacturing of Aluminium alloy materials for the automotive sector. The main products are cast Aluminium alloy ingots, cast Aluminium alloy liquid and Aluminium alloy rods, with a total annual production capacity of 160,000 tonnes. The production process includes raw material inspection \rightarrow batching \rightarrow smelting \rightarrow process inspection \rightarrow refining \rightarrow Casting, etc.

The Entity's business premises are located at No. 15, Jinshan North Road, Qinhuangdao Economic and Technological Development Zone. The Entity has a total of 10 smelting equipment, five thermal insulation equipment, one gas homogenising furnace, three ash machines and one cold ash bucket. There are two main sites in the area, with a total construction area of 23,512 square metres. The factory area is the east side of the office building and the office area on the east side of the second floor is Qinhuangdao Lizhong Wheel Co., Ltd., with a construction area of 7584square metres.

The Entity has approximately 135 employees, and the Associated Facilities includes dormitories, canteens, administrative offices, production workshops, warehouses, etc. The north side of the Entity is Heilongjiang Road, which mainly consists of enterprises such as Daika Xinglong and Ruilite Environmental Protection Building Materials; the south is Nenjiang West Road, which primarily consist of enterprises such as Eternal Decoration and Harbor City Electric Power Engineering; the west is adjacent to Dasheng Stainless Steel, Huaguang and other enterprises: the east side is Jinshan Road, and the partition road is mainly distributed by enterprises such as Tonglida Environmental Protection and Dafeng Science and Trade. The main external Stakeholders include local administrative departments, industrial zone management offices and customers.

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	High	High	Medium	HIGH
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MED	IUM	

FINDINGS

CRITERION	RATING	СОММЕПТ
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain awareness of Compliance and ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has a supervision department and a management department to collect and manage complaints and reports. The Group has established an anti-Bribery morality rule that applies to the management process of all people within the Group. The Entity has developed an internal complaint management mechanism which addresses Corruption: http://www.meilvhejin.cn/uploads/tinymce/images/c2e4360bcac047786ade47a3dbe798f566f26e0f19be6.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct (page 15) including principles relevant to environmental, social and governance performance, which was approved by senior management, and is available at: http://www.meilvhejin.cn/uploads/tinymce/images/60470ddf07b8d8bde999ce60e6caablf66f26a938a6e7.pdf
		An internal ASI Audit and management review is conducted annually to ensure the normal and effective operation of the Entity's system.
2. POLICY AND MANAGEMEN	ІТ	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Environmental, Social, and Governance (ESG) Policy (page 17) has been established and implemented and is reviewed annually: http://www.meilvhejin.cn/uploads/tinymce/images/60470ddf07b8d8bde999ce60e6caablf66f26a938a6e7.pdf
		The Entity has established Policies, that address environmental, Occupational Health and Safety, ASI performance and energy. The General Manager has approved each of these Policies. The Environmental, Social, and Governance Policy has been internally communicated via training and presentation on the notice board in the plant.
2.2a-c Leadership	Conformance	The Entity has nominated the leader of the Technology Research and Development (R&D) Centre as ASI Management Representative, who has overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. Related Policies were communicated to employees through internal training, posting on the company website and other means. The Entity provides human resources, funds, internal training and other resources for the effective implementation of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has developed and implemented an ISO 14001:2015 certified integrated Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented an integrated Management System. The Entity has obtained IATF 16949ISO 14001, ISO 45001 and ISO50001 certification.

CRITERION	RATING	COMMENT
		A SA8000:2014 management manual has been established and implemented to manage risks with respect to Human Rights and Labour Rights.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Procurement Policy covering environmental, social and governance issues: The Responsible Sourcing Policy is publicly disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/416bc76f69bc3ffed3dd188f299979ld66f26c8e792aa.pdf
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 Entity has disclosed its environmental and social impact related performance in the 2023 ESG Report, page 18: http://www.meilvhejin.cn/uploads/tinymce/images/60470ddf07b8d8bde999ce60e6caab1f66f26a938a6e7.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. However, the Entity has developed a procedure to identify and assess Human Rights risks. The Human Rights Impact Assessment Report is available at: http://www.meilvhejin.cn/uploads/tinymce/images/28d4fe0b4ef9765b5913d1ff72e2a5b666f26be375c88.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plan, and this Plas has been registered at the local authority. Drills are conducted according to the Plan including an evaluation of their effectiveness. The latest version of the Emergency Response Plan is available at: http://www.lizhong.com.cn/article/show/268.html
2.8a-d Suspended Operations	Conformance	The Entity has established and implemented a Suspended Operations Management Regulation and Business Resilience Plan. There are no changes to the Business currently planned.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. There have been no merger and acquisition activities, nor are any planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for reviewing environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There have been no closure, decommissioning or divestment activities, nor are any planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non- Conformance	The 2023 Environmental, Social and Governance (ESG) Report has been disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf

CRITERION	RATING	COMMENT
		The Report describes the Entity's impact on the environment, society, and economy, including occupational health, green environmental protection, labour rights and business ethics.
		However, it was identified the information disclosed in the Report lacks quantitative results and its substantive issues are not fully disclosed, such as greenhouse gas emissions reduction plans and conflict mineral management.
3.2 Non-compliance and Liabilities	Conformance	The Entity did not receive any no fines, judgments, penalties or non-economic sanctions in 2023, as confirmed via www.creditchina.gov.cn
		The Entity has disclosed the results of the 2023 national corporate credit inquiry in the 2023 Environment, Social and Governance Report, page 18: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
3.3a-c Payments to Governments	Conformance	The Entity has made on its behalf, payments to Governments on a legal and/or contractual basis.
		The Entity provided an audit report on its 2023 financial statements issued by an independent third party. The audit report disclosed payments to the Government (i.e. taxes payable). The 2023 financial audit report confirms that payments have been made to the Government in accordance with the law and/or contract, available at: http://www.meilvhejin.cn/article/show/69.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally sensitive Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. The Complaint Management Mechanism and channels are available at: http://www.meilvhejin.cn/uploads/tinymce/images/c2e4360bcac047786ade47a3dbe798f566f26e0f19be6.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Life Cycle Assessment (LCA) for the entire process life cycle of a single tonne of A356 Aluminium. The Entity provides a product LCA Report, focusing on the entire Aluminium industry chain of 1 tonne of A356 products. It also provides a carbon footprint report for A356 Aluminium alloy products. The evaluation results demonstrate the life cycle ('cradle to gate') carbon footprint of the A356 series products.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non- Conformance	The Entity has developed a Life Cycle Assessment (LCA) for its Aluminum products conversion, available at: http://www.meilvhejin.cn/uploads/tinymce/images/dledef5f78a4cfd56084487d4c40b96766f26fcc6bb01.pdf The boundary of the LCA report is 'cradle to gate' (i.e. from resource mining to product delivery), which is divided into the raw material acquisition stage and the product production stage. However, it was identified the 2023 LCA product LCA Report is currently incomplete. The main assumptions of the report are also not stated, and no sensitivity analysis was conducted.

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity's products are all produced in accordance with the technical specifications or requirements provided by customers. It has no product design and development capabilities and responsibilities and only retains process design and development related content.
		However, the Entity has established a 'Process Design and R&D Control Procedure', in which the Entity fully considers the harmful impacts on the environment and social safety and tracks the environmental and social safety goals to improve the sustainability of products and manufacturing processes.
4.3a-b Aluminium Process Scrap	Conformance	As verified via on-site visits, the Entity classifies waste materials according to the types and grades of Aluminium products that are recycled. The recycling rate of processing waste is currently at 100%.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established a Scrap Aluminium recycling plan and has demonstrated the recycling of Scrap wheels and Scrap Aluminium chips in 2023 is higher than the established target. Strategies have been formulated for 2024-2025. The strategy is disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/6937c8688dff37c3c455fc4118567db466f26d3aa22f6.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is not engaged with local, regional, or national collection and recycling systems. However, the Entity has signed a Scrap collection and recycling contract with an Aluminium automotive component manufacturer and has a monthly Aluminium Scrap processing settlement statement to improve the Entity's recycling rate of Aluminium-containing products in the relevant market.
		The Entity has provided a Scrap Aluminium recycling plan, showing that the recycling of Scrap wheels and Scrap Aluminium chips in 2023 is higher than the target value. Strategies have been formulated for 2024-2025. The strategy is disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/6937c8688dff37c3c455fc4l18567db466f26d3aa22f6.pdf
5. GREENHOUSE GAS EMISSI	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity engages a consulting agency to assess greenhouse gas emissions (GHG) and energy use. The 2023 GHG inventory report includes Scopes 1, 2 and 3 and is publicly disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/81f4647fb184a320 96bcb06f655ce00966f26b2f3a04f.pdf
		The verification report is available at: http://www.meilvhejin.cn/uploads/tinymce/images/fcb99893274eefa 9144bdc651f24966666f26b00b5641.pdf
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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has published a time-bound Greenhouse Gases reduction target. The plan to achieve the greenhouse gas reduction target covers the reduction of direct and indirect emissions. The Entity has used the ASI Entity-level greenhouse gas reduction pathway method to calculate the 2024-2027 Casting process slope value and Casting procurement slope value based on 2023 as the base year. The emission reduction plan is available at: http://www.meilvhejin.cn/uploads/tinymce/images/c7a7191f74c4fc4326a301457ef0299b66f26ddb535d5.pdf
5.4 GHG Emissions Management	Conformance	The Entity has formulated the 'Life Cycle Assessment Management Regulations' and established the content and plan for greenhouse gas emission reduction to reduce greenhouse gas emissions from raw materials, production processes, energy resources, and carbon emission management system construction, to achieve performance consistent with the greenhouse gas emission reduction plan and goals.
6. EMISSIONS, EFFLUENTS AN	ID WASTE	
6.la-f Emissions to Air	Conformance	The Entity has obtained ISO 14001:2015 certification and has established and implemented dust and exhaust gas Management Systems. The Entity has obtained air pollutant emission permits and regularly monitors as required. The Entity tracks the completion of emission reduction targets annually. The Entity's 2023 emissions and 2024 emission reduction plan are disclosed at: http://www.meilvhejin.cn/uploads/tinymce/images/aldad403bda2591 ale05560e0137c41966f26dac4bc16.pdf The Entity has installed emission purification facilities in accordance with the Environmental Impact Assessment Report to eliminate any adverse effects.
6.2a-g Discharges to Waters	Conformance	The Entity controls Discharges to Water bodies using water pollutant treatment facilities and performs regular monitoring to ensure compliance with local statutory discharge limits. No production wastewater is generated. The Entity has quantified and reported water discharges that have adverse effects on humans or the environment. The Environmental Impact Assessment Report is available via the Hebei Provincial Development and Reform Commission at: http://tzxm.hbzwfw.gov.cn/sbglweb/index (login credentials required)
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity controls Discharges to Water bodies using water pollutant treatment facilities and performs regular monitoring to ensure compliance with local statutory discharge limits. There is no production of wastewater generated. The Entity has quantified and reported water discharges that have adverse effects on humans or the environment. The Environmental Impact Assessment Report is available at: http://www.meilvhejin.cn/uploads/tinymce/images/f05f6497083325356b5327e4869334a866f26f710ec94.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has prepared an Emergency Preparedness and Response Control Procedure, which stipulates that in the event of a leak, the heads of surrounding villages must be notified of the potential impact and the affected peoples. The Entity has also prepared an Environmental Factor Identification and Evaluation Form, which

CRITERION	RATING	COMMENT
		includes the risk identification of natural gas and Aluminium liquid leaks. The 2023 ESG Report (page 10) demonstrates that the Entity did not have any leaks in 2023, and is available at: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Solid Waste Management System with a defined waste management strategy, including how to minimise, reuse, classify and dispose of waste. A risk assessment of waste disposal has been conducted, including the implementation of waste reduction through the optimisation of technologies.
		The disclosure of the annual generation of Hazardous Waste and Non-Hazardous Waste and the methods and means of disposal is included in the 2023 ESG Report, pages 48 and 79: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has established and implemented a Hazardous Waste pollution prevention and control responsibility system. The Entity has taken steps to maximise the recovery of Aluminium ash slag generated during the process. The Aluminium ash slag undergoes slag separation, and the screened Aluminium slag is returned to the furnace for reuse. The Aluminium ash is reported to the solid waste management system using an intelligent weighing system. It is then stored and sent to a third party for treatment. Aluminium ash is not sent to landfill. During the on-site inspection, it was noted that waste residues are stored in a dedicated warehouse and are appropriately labelled. The warehouse floor is designed to be leak-proof to prevent waste residues and leachate from being discharged into the environment.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity identifies, records, and publicly discloses its water intake, use by water source, and type annually in the 2023 ESG Report, page 18: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
		The Entity has prepared a Water Balance Test Report which is available at: http://www.meilvhejin.cn/uploads/tinymce/images/a70c5a0299261228c8c6b5676f16dd4266f26e5f2822a.pdf
		The outcome of the assessment confirmed that water risks are low, however, the Entity continues to monitor water quality annually.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment determined the water risk is low, however, they continue to monitor water quality annually.

CRITERION	RATING	COMMENT			
8. BIODIVERSITY AND ECOSY	8. BIODIVERSITY AND ECOSYSTEM SERVICES				
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The Entity has developed a plan to control the risks with control measures presented in its Biodiversity Assessment Report, available at: http://www.meilvhejin.cn/uploads/tinymce/images/3ef4aa4100ab689 2641712b776911a2466f28cf89274f.pdf The evaluation results indicate that the risk to Biodiversity and Ecosystem Services is low.			
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as it has assessed risks on Biodiversity and Ecosystem Services in its Area of Influence which concluded that the Entity is not dependent on specific Ecosystem Services. There are no or limited ecological services systems identified.			
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 to be low. The Entity has published information on the findings of the Biodiversity Assessment Report, available at: http://www.meilvhejin.cn/uploads/tinymce/images/3ef4aa4100ab689 2641712b776911a2466f26cf89274f.pdf			
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. There are no or limited ecological services systems identified.			
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The Entity provided the 2024 Alien Invasive Species Query Assessment Report, which shows that in addition to assessing both China and Hebei Province, it also describes the hazards, distribution and response measures of invasive animals and plants. The assessment results show that the possibility of the Entity accidentally or intentionally introducing Alien Species is low.			
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located within a Government-designated industrial zone and has pledged not to explore or build New Projects in the World Heritage sites. For all renovation and expansion projects involving the Entity, the Construction Project Environmental Impact Report has been completed which identifies surrounding cultural relics. Construction activities can only be undertaken after it is confirmed that there are no cultural relics within the scope.			
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located within a Government-designated industrial zone that is outside of any Protected Area. Its production and Business Activities are conducted solely within the industrial zone.			
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.			

CRITERION	RATING	COMMENT
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 Women's Rights Management Procedure to implement the Entity's gender equality and women's rights program. The results of the Human Rights Due Diligence are disclosed in the 2023 ESG Report, page 81: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
		The Entity's gender equality and women's rights program has been reviewed annually and/or in the event of any changes or control deficiencies. Interviews with management and employees on site indicated that no Human Rights violations were identified in the Entity.
		The Entity's Human Rights Impact Commitment Letter has added a commitment to promote gender equality. A Distribution Map of Affected Human Rights Organizations has been developed that identifies the Entity's surroundings are industrial enterprises, there are no community organisations, and there are no impacts on surrounding communities and people's organisations. Due diligence reports on employees, suppliers, and surrounding organisations were provided at the Audit, and the survey results are available in the 2023 ESG Report, pages 31 and 83: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
		The Entity's Human Rights Commitment Policy is available at: http://www.meilvhejin.cn/article/show/47.html
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity identifies women's rights and interests and takes control measures to ensure these rights are met. The women Workers committee conducts regular interviews and offers an open channel for complaints. The outcomes of the annual female employee satisfaction survey all reflect the efforts of the Entity's Women Workers Committee to promote the rights and interests of female employees and advance gender equality.
		The Entity has discussed the effectiveness of measures to promote gender equality in the 2023 ESG Report, pages 57-59: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
		However, the Entity has established protection Policies for Indigenous Peoples and FPIC Management Regulations, available at: http://www.meilvhejin.cn/uploads/tinymce/images/f529a5e63a7a1c829b412409234f079b66f26f48d5314.pdf
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
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 there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, it is located within an industrial zone that has been planned and constructed by Local Government. There are no cultural and sacred heritage sites 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 Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located within an Industrial zone, and it has not caused any resettlements to occur. However, the Entity has established a Resettlements Management procedure to manage resettlements if they do occur in future.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has formulated the Due Diligence Management Regulations, which clearly define Human Rights Due Diligence will be conducted regarding the community or Indigenous Peoples. There are no community residential areas or sensitive populations located within one kilometre of the Entity. However, the Entity is surrounded by businesses and has collected feedback from surrounding enterprises and disclosed the construction product to the local community which was completed in 2021.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has formulated the Conflict Mineral Management Regulations, which clearly state that procurement should identify supply chain risks in high-risk countries and propose response plans. Based on the review of the Conflict Affected and High-Risk Area (CAHRAs) records, it was noted that all suppliers are from China. Suppliers have signed an agreement not to use minerals from CAHRAS.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established Conflict mineral management regulations and has conducted a risk assessment. The Entity has implemented the Procurement and Supplier Management Procedures and conducts annual social responsibility surveys and conflict mineral surveys on suppliers to assess risks and summarise the survey results. All materials are supplied from China, and the risk assessment results determined that there is a limited risk of armed conflict or Human Rights violations in the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, raw Aluminium material is sourced from China, and the risk assessment determines there is a limited risk of armed conflict or Human Rights abuses in the Entity's supply chain.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices and risk assessment were reviewed as part of the ASI Performance Standard Certification Audit, which addresses the requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non- Conformance	The Entity has established regulations to conduct Due Diligence on suppliers, and Conflict-Affected and High-Risk Areas. The 2023 ESG Report outlines its efforts in implementing supply chain Due Diligence activities, however, it does not include relevant detailed information relating to CAHRAs. http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices to respect Human Rights, where the Entity's procedure requires security guards to respect Human Rights. All security guards have been trained in Human Rights requirements. No security-related Human rights violations have been reported to date.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the Entity follows Applicable Laws regarding Freedom of Association and Collective Bargaining in China. The Entity commits itself to respect Workers' rights and an association for Workers was established in accordance with legal requirements.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established the Regulations on the Management of Freedom of Association and Collective Bargaining, which defined Workers' rights to Freedom of Association and the right to Collective Bargaining. The Trade Union was established according to Chinese law (Chinese Trade Union Law). Workers' representatives represent Workers' concerns with management on their behalf. There is currently no Collective Bargaining agreement on site.
10.2a Child Labour	Conformance	The Entity has developed a Child Labor and Juvenile Worker Protection Procedure which prohibits the use of Child Labour. No Child Labourers or underage Workers are working at the Entity, and the youngest worker is 25 years old. Underage Workers (16 to 18 years old) are specially protected by law and are not allowed to work in hazardous working conditions.
10.3a-c Forced Labour	Conformance	The Entity has established a Prohibition of Forced Labour Procedure and Policy on Modern Slavery and Human Trafficking, which strictly prohibits Forced Labour, including Human Trafficking and Modern Slavery. This applies to the Entity and its suppliers and emphasizes the importance of compliance with the prohibition of Forced Labour, slavery, and Human Trafficking. Based on Worker interviews and document review, there are no instances of illegal wage deduction, Debt Bondage, or any other form of Forced Labour at the Entity. Information on the Policy and its implementation is available at: http://www.meilvhejin.cn/uploads/tinymce/images/ed15fe02eda20948b8dcd332808ad7dc66f26c3al9af8.pdf
10.4a-c Non- Discrimination	Conformance	The Entity has established 'Management Regulations on the Prohibition of Discrimination, 'Special Protection of Women Workers' and the Employee Handbook to ensure equal opportunities and does not engage in or support Discrimination. According to the interviews with

CRITERION	RATING	COMMENT
		employees, it was found that the employees were clearly aware of the anti-Discrimination regulations. No Discrimination cases were received.
		The Entity promotes an anti-Discrimination culture through training, publicity and other internal communication channels.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication with Workers and Worker representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment. The Entity has demonstrated that they have implemented employees' suggestions where they are deemed appropriate.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures are following legal requirements. A Human Rights Policy is implemented at the Entity to prohibit Violence and inhumane treatment of employees, available at: http://www.meilvhejin.cn/uploads/tinymce/images/e9cec5750bd5b9067bfc8774406c0b5f66f26ece78e4c.pdf
		The Entity provides training to employees on document content and complaint channels. Employee representatives, elected by Workers, facilitate communication with management. They hold meetings, gather employee suggestions through interviews, and negotiate with senior management, providing records of these meetings.
		Based on Worker interviews, there are no Violence and Harassment issues currently present at the Entity.
10.7a-c Remuneration	Conformance	The Entity has a clear wage structure with the base wage above the statutory minimum. The gross wage meets the basic needs of Workers; all Workers are covered by the mandatory social insurance scheme. The Entity has established a payroll management control procedure, which handles the monthly payment of wages in legal tender and is fully documented. This is reviewed by employees from different departments and a sample of bank transfer records is reviewed.
10.8a-c Working Time	Minor Non- Conformance	The Entity has established clear regulations regarding working hours and Overtime management for its employees. The Entity operates in three-shift and two-shift schedules.
		However, interviews with employees and a review of attendance records reveal that some individuals are unable to take a day off at least once every seven days. Additionally, the average working hours in the sampled six-month period was 8.34 hours per day.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established Policies and informed employees of their right to freedom of association and Collective Bargaining by means of training, email, notice and regular meetings. The Entity provides a prejob training program for new employees, covering group and company culture and the Code of Conduct among other requirements.

CRITERION	RATING	COMMENT		
11. OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non- Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System. However it was identified during the workshop visit, it was identified the maintenance and implementation of some equipment and facilities was inadequate which posed a potential health and safety risk to employees.		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The OH&S system is reviewed by a certification body once every three years. The Entity disclosed comparative analyses of performance with peer Businesses and leading practices in the 2023 ESG Report, pages 11, 71-78 and 81: http://www.meilvhejin.cn/uploads/tinymce/images/1d23dada9e0421c 258a4cbfec20186c566f26fa08eacd.pdf		
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an OH&S Management System and obtained the ISO 45001:2018 certificate. The Entity has provided Workers with a mechanism to raise, discuss and participate in the resolution of Occupational Health and Safety issues with management such as suggestion boxes, regular employee representative meetings and occupational health and safety meetings.		

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	21 January 2024	Initial Certification Audit – Full Certification