

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Anhui Maximum Aluminium Industries Co., Ltd.

CERTIFICATE NUMBER
412

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
7 MARCH 2025

DATE OF EXPIRY
6 MARCH 2026

CERTIFIED SINCE
7 MARCH 2025

AUTHORISED BY

CERTIFICATION SCOPE

Anhui Maximum Aluminium
Industries Co., Ltd., located at No.
88, Yinghua West Road, Suixi
Economic Development Zone,
Huaibei, Anhui, China.

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

* Provisional Certification is valid
for the period of one year, during
which the company can address
the non-conformances assessed
and subsequently seek full
certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Maximum Aluminium Industries Co., Ltd.
CERTIFICATION SCOPE	Anhui Maximum Aluminium Industries Co., Ltd., located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 10 – 11 October 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 30 October 2024
AUDIT SCOPE	<p>The Audit Scope included the casting and cold rolling workshops of Anhui Maximum Aluminium Industries Co., Ltd. at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">☑ 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	7 March 2025 – 6 March 2026

NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	6 September 2025
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CERTIFICATE NUMBER	412
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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.

ENTITY OVERVIEW

Anhui Maximum Aluminium Industries Co., Ltd. (the 'Entity') is located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei City, Anhui Province. It commenced operations in April 2013 and was fully acquired in 2017 by Jiangsu Zhongji Composite Material Co., Ltd, a subsidiary of Wanshun New Material, after which it was renamed Anhui Zhongji Battery Foil Technology Co., Ltd.

Initially comprising three major workshops—casting, cold rolling, and foil rolling—the casting and cold rolling workshops were separated from Anhui Zhongji at the end of 2022 and re-established as Anhui Maximum Aluminium Industries Co., Ltd (the 'Entity'). The Entity specialises in producing Aluminium plate strips with an annual production capacity of 60,000 tonnes. Its key processes include casting, rolling, and cold rolling.

The Entity operates two plants, a canteen building, and an office building, employing over 170 persons.

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	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a management process for identifying, assessing and maintaining ASI-related legal and other requirements. These requirements have been integrated into operational management, and compliance is evaluated annually.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented Policies and procedures to manage Anti-Corruption, including whistleblowing mechanisms, such as a suggestion box, hotline and email, which are communicated to employees and relevant parties. Anti-Corruption training is provided to employees in high-risk positions and the Policy is shared with all suppliers, who sign commitment letters in acknowledgement.
1.3a-e Code of Conduct	Conformance	The Entity has developed a Code of Conduct that outlines principles related to Environmental, Social and Governance (ESG) performance. It has implemented training and communication initiatives to raise awareness of the Code among business partners and suppliers. The Code of Conduct is reviewed annually during the management review meeting, or when Material changes or control gaps arise. The Code of Conduct is publicly disclosed at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910105119.doc&wdOrigin=BROWSELINK
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity implements management Policies aligned with ESG practices. Senior management is committed to these Policies, which are reviewed annually and whenever there are Material changes or control gaps. The Policies are accessible to both internal and external Stakeholders at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910105101.doc&wdOrigin=BROWSELINK
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative with overall responsibility and authority for ensuring conformance with the ASI Performance Standard. This includes leading communication of ASI-related requirements and Policies through training and on-site postings.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System and holds a valid ISO 14001:2015 certification. The latest external audit by was conducted in June 2024 and identified no major non-conformities.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management System that assesses key social and Occupational Health and Safety (OH&S) impacts. Management provisions for preventing and mitigating these impacts are also implemented.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes for responsible sourcing. It conducts second-party Due Diligence audits at major next-tier supplier sites for qualification. The procurement team and relevant personnel undergo annual training on responsible sourcing requirements. The Responsible Purchasing Policy is reviewed annually during the management review meeting and is updated if there is a Material change or control gap. The Responsible Purchasing Policy is available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20241017134353.doc&wdOrigin=BROWSELINK</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity is developing an expansion project that includes two new casthouse lines for producing 120,000 tonnes of Aluminium plate strip. It has evaluated environmental and social impacts in compliance with legal requirements and has implemented a management plan to prevent and mitigate significant impacts relating to the project. The plan is periodically reviewed and updated as needed. The Environmental and Social Impact Assessments, along with the latest version of the management plan, are publicly disclosed at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20241206111041.docx&wdOrigin=BROWSELINK</p> <p>and:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20241206111112.docx&wdOrigin=BROWSELINK</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity is developing an expansion project that includes two new casthouse lines for producing 120,000 tonnes of Aluminium plate strip. It has identified and assessed Human Rights risks and has implemented control measures based on the ASI Performance Standard and relevant legal requirements. The Human Rights assessment concludes that, due to the project's scale and nature, the risks and impacts are mitigated. There are no Indigenous Peoples within the Entity's Areas of Influence. The Human Rights risk assessment is reviewed during the annual management review meeting. The assessment report and the latest active version of the management plan are publicly disclosed at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20241206153325.doc&wdOrigin=BROWSELINK</p> <p>and: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20241206111112.docx&wdOrigin=BROWSELINK</p>
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has developed two emergency response plans for sudden environmental incidents and for production safety accidents, both registered with the relevant Government agencies. The Entity provides employee training and conducts drills on emergency response. These Plans are reviewed every three years or whenever there is a Material change or control gap and will be re-summitted to the authorities for registration. The two emergency response plans are available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20240910104915.doc&wdOrigin=BROWSELINK</p> <p>and: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc.n.ahzjalufail.com%2Fupload%2F20240910104915.doc&wdOrigin=BROWSELINK</p>

CRITERION	RATING	COMMENT
		%2Fcn.ahzjalufail.com%2Fupload%2F20240910104847.docx&wdOrigin=BROWSELINK However, the Entity's annual fire safety system test is absent from these plans.
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan that addresses Material adverse environmental, social and governance impacts. The Plan has been developed in collaboration with key Stakeholders, including Workers and their representatives. According to the Entity's ASI Performance Standard management manual, the Plan will be reviewed during the annual management meeting or whenever there are Material Business changes or control gaps.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for Mergers and Acquisitions. No such instance has occurred since its establishment in 2011.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment. No such instance has occurred since its establishment in 2011.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and Material environmental, social, and economic impacts in its 2023 Sustainability Report, available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufail.com%2Fupload%2F20241017134630.docx&wdOrigin=BROWSELINK
3.2 Non-compliance and Liabilities	Conformance	There were no monetary fines, judgments, penalties and non-monetary sanctions received by the Entity for failure to comply with Applicable Law in 2023. This was confirmed through management interviews and through a review of the official websites of relevant Government agencies and Non-Government Organisations (NGOs). This information is also available in the Entity's 2023 Sustainability Report, page 8: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufail.com%2Fupload%2F20241017134630.docx&wdOrigin=BROWSELINK
3.3a-c Payments to Governments	Conformance	According to the Entity's internal control procedures, payments to Governments are made solely on a legal basis. Payments to Governments are limited to taxes, with no other items involved. Detailed information is available in the Entity's 2023 Sustainability Report, page 19: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufail.com%2Fupload%2F20241017134630.docx&wdOrigin=BROWSELINK
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's Complaints Resolution Policy encourages whistleblowing of the misconduct while ensuring the whistleblower's privacy. The hotline and email for reporting, available to both internal and external individuals, are listed in the Responsible Purchasing Policy at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufail.com%2Fupload%2F20241017134353.doc&wdOrigin=BROWSELINK

CRITERION	RATING	COMMENT
		<p><u>SELINK</u></p> <p>and in the 2023 Sustainability Report, section 6, page 9 at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufoil.com%2Fupload%2F20241017134630.docx&wdOrigin=BRO <u>WSELINK</u></p> <p>The Complaints Resolution Mechanism is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufoil.com%2Fupload%2F20240910104809.docx&wdOrigin=BRO <u>WSELINK</u></p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has assessed the environmental impacts of its main product lines of Aluminium plate strip, using its established methods. The Life Cycle Assessment (LCA) also incorporates production Waste disposal. The Entity's LCA report is publicly available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufoil.com%2Fupload%2F20241021100046.docx&wdOrigin=BRO <u>WSELINK</u></p> <p>However, the Entity's lifecycle assessment report does not follow the 'cradle-to-gate' approach, and the data inventory currently contains gaps.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity's environmental impact LCA report covers its Aluminium plate strip products. The Entity is committed to providing additional lifecycle data upon customer request. The report includes basic LCA information and assumptions and is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufoil.com%2Fupload%2F20241021100046.docx&wdOrigin=BRO <u>WSELINK</u></p> <p>However, the information in the Entity's LCA report is currently incomplete.</p>
4.2 Product Design	Conformance	<p>The Entity does not engage in product design but rather incorporates sustainability objectives into its production process and raw material procurement to improve product sustainability, including the environmental lifecycle impact of the final products.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established regulations for Aluminium Scrap recycling, with a target of 100% collection and recycling of Process Scrap. It has implemented technical and management measures to reduce the generation of Aluminium Process Scrap and achieve this recycling target.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity uses Aluminium ingots and processed Aluminium Scrap as raw materials and does not utilise end-of-life Aluminium. Due to the lack of comprehensive local, regional, or national Aluminium Scrap collection and recycling systems in China, the Entity has collaborated with downstream customers to improve product recycling rates at 'end-of-life'. Additionally, the Entity actively participates in public</p>

CRITERION	RATING	COMMENT
		seminars on post-consumer Aluminium Scrap recycling and is committed to supporting public welfare projects to promote recycling.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has completed a Greenhouse Gas (GHG) Inventory Report at the organisational level and engaged a third party to verify data. Scope 3 indirect emissions are included in the calculations and reporting scope. In 2023, the Entity's organisational GHG Emissions totalled 758,976 t CO₂e. The Report is publicly available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufol.com%2Fupload%2F20241017145409.docx&wdOrigin=BROWSELINK</p> <p>However, the emission data in the GHG Inventory Report are inconsistent with the verification report.</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 developed a GHG emission reduction strategy aimed at reducing the CO₂ emission intensity of its products to below 12.0 tonnes CO₂e/t from 'cradle to gate' by 2028. To achieve this, the Entity is implementing various technological and managerial measures to minimise GHG emissions across its supply chain and production processes. In addition to general initiatives like improving energy efficiency and optimising processes to reduce energy consumption, the Entity's primary strategy focuses on sourcing low-carbon footprint raw materials, such as primary Aluminium, to lower product carbon intensity. The Entity has used the ASI GHG Pathway Calculation Tool to validate its plan, confirming alignment with the 1.5°C scenario criteria. The full GHG Emission Reduction Strategy and Plan is publicly available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufol.com%2Fupload%2F20241017134850.docx&wdOrigin=BROWSELINK</p> <p>The Entity's ASI Entity GHG Pathways Calculation Sheet can be accessed at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufol.com%2Fupload%2F20241211150223.xls&wdOrigin=BROWSELINK</p>
5.4 GHG Emissions Management	Conformance	The Entity has developed a GHG Emission Reduction Plan to outline its approach to managing GHG emissions, with a primary focus on energy management. Through site observations, document reviews, interviews, and using the Plan-Do-Check-Act approach, the Entity manages energy consumption and monitors system performance to achieve the reduction targets.
6. EMISSIONS, EFFLUENTS AND WASTE		

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Major Non-Conformance	<p>The Entity's primary sources of air pollution are Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOx). To address this, the Entity has implemented an air emissions management programme, which includes regular maintenance of air pollution control systems and routine exhaust emission checks. The Entity commits to updating the programme when significant air pollution risks arise and to regularly reviewing its reduction plan. Annual reports on air pollutant monitoring confirm compliance with regulatory standards. The Entity's pollution reduction plan and annual emissions data are available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20241017134957.docx&wdOrigin=BRO WSELINK</p> <p>However, the air pollutant reduction plan lacks formal programmes to ensure the achievement of the air pollutant reduction strategy. Additionally, the Entity was penalised by the environmental protection department in September 2024 for inadequate management of uncontrolled waste gas emissions.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity focuses on Aluminium casting, rolling, and sheet rolling processes, which do not generate process wastewater. An assessment of water resources and annual monitoring of domestic wastewater discharge shows that the Entity's water use has minimal impact on water resources and the environment. Whilst the Entity does not currently plan to reduce water pollutant concentrations, it aims to decrease overall wastewater discharge volumes by 5% by 2028. Should any process wastewater be produced in the future, the Entity will develop a plan to reduce water pollutants in compliance with ASI Performance Standard requirements. Additionally, the Entity commits to regularly reviewing and addressing any deficiencies in its water pollutant management plan. The Entity's Wastewater Pollutants Report and Reduction Plan is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20241017134957.docx&wdOrigin=BRO WSELINK</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has a procedure for assessing and managing the risks of Spills and Leakages and prepares corresponding emergency response plans. The risk identification and emergency response plan is publicly available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910104915.doc&wdOrigin=BRO WSELINK</p> <p>The Entity conducts regular assessments to identify potential sources of Spills and Leakages. It also commits to updating and improving emergency response and leak prevention plans whenever changes in the Entity may impact significant risks, or when control gaps are identified.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's environmental protection management procedure and emergency response plans outline the process for reporting Spills and Leakages. Since its establishment in 2022, no Spills have been recorded. The latest Spills and Leakages risk assessment report and emergency response plan are available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910104534.xls&wdOrigin=BROW SELINK</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity's environmental Management System addresses Waste management. The Entity has implemented a Waste strategy following the Waste mitigation hierarchy, focusing on reusing and recycling to reduce Material impacts. Hazardous Waste disposal complies with legal requirements. The Entity publicly disclosed the quantity of hazardous and non-hazardous Waste generated in 2023 at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufail.com%2Fupload%2F20240119104858.docx&wdOrigin=BRO WSELINK
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 implemented a management process for collecting and reducing the Aluminium content in Dross. Monthly reviews are conducted to assess overall Aluminium content and collection to maximise Aluminium utilisation. The generated Dross is sent to Government-approved hazardous Waste disposal companies for recycling into building materials, purifying agents and other products. The Entity performs annual on-site inspections of these recycling companies to ensure the Dross is not landfilled. Additionally, a plan has been developed to reduce the Aluminium content in unprocessed Dross, further improving raw material utilisation.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has documented its water intake and usage, including sources and types, in environmental impact and water resource risk assessments. It has evaluated water-related risks, considering the surrounding water environment, intake and discharge, and the effectiveness of existing management measures. The Entity's overall water resource risk has been assessed as low, with no significant water-related risks within its Area of Influence. A risk assessment report and water balance diagram are available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufail.com%2Fupload%2F20240910104511.docx&wdOrigin=BRO WSELINK
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risk assessment was rated as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A qualified third party has conducted the environmental impact assessment, which included the evaluation of Biodiversity and Ecosystem Service risks. The local environmental protection agency has approved the outcomes of this assessment. Based on this risk assessment, the Entity's Area of Influence does not impact any Biodiversity-sensitive areas. The Entity is located within a Government-planned industrial zone with a functional environmental Management System.

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 the impacts on Biodiversity and Ecosystem Service are assessed as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the impacts on Biodiversity are assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the impacts on Biodiversity and Ecosystem Service are assessed as low and no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has implemented a management Policy and procedures to prevent the introduction of invasive species. Potential risks associated with their introduction through operations and logistics activities have been identified, and an assessment has evaluated their potential impact on Biodiversity and Ecosystem Services. Based on the Biodiversity assessment, the risk of introducing invasive species through the Entity's activities is considered extremely low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to not exploring or developing new projects or making major changes in World Heritage Properties. There are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	According to the Environmental Impact Assessment Report approved by the local environmental protection agency, no Protected Areas exist within the Entity's Area of Influence.
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	Minor Non-Conformance	<p>The Entity has implemented a Policy that commits to respecting Human Rights, including Gender Equity, and has communicated it to all Stakeholders through an engagement process. The Entity conducts an annual review of the Policy's implementation during management reviews and commits to revising the Policy promptly if significant risks or control gaps arise. The Policy is publicly available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fn.ahzjalufol.com%2Fupload%2F20240910105101.doc&wdOrigin=BROWSELINK</p> <p>The Entity has implemented a Human Rights Due Diligence process to identify and assess Human Rights risks, with the primary risks found in the supply chain. The Supplier Code of Conduct is communicated to key suppliers, and mitigation measures, including audits, are in place. Audit reports indicate no adverse findings. The Due Diligence process is reviewed annually by management.</p> <p>The Entity has identified Affected Populations and Organisations by its operations, such as neighbouring Businesses and employees near its plants, through its compliance and risk control procedures. The Entity's Human Rights Risk Assessment Report confirms minimal impact on Human Rights within its Area of Influence. The Entity maintains close</p>

CRITERION	RATING	COMMENT
		<p>communication with Affected Populations and Organisations via the industrial zone management committee. No negative Human Rights issues have been reported online.</p> <p>However, the Entity's social supply chain audit for on-site service providers is not conducted in accordance with the Entity's annual audit plan.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect women's rights which is supported by a program that promotes Gender Equity and women's empowerment throughout the employment process. No complaints have been received from female Workers, and those interviewed are aware of their rights with no negative feedback provided. The Entity regularly assesses the program on Gender Equity and women's empowerment, with the report available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcdn.ahzjalufail.com%2Fupload%2F20240910104358.docx&wdOrigin=BROWSELINK</p>
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.
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.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.
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	Conformance	The Entity has established a process to identify Sacred and Cultural Heritage sites and values within its Area of Influence, take appropriate actions to avoid or mitigate impacts, and ensure continued access to these sites. No Sacred and Cultural Heritage sites 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 and Sacred Heritage sites within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it purchased the land from the local government and has not conducted any Resettlement or Displacement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is committed to respecting the legal and customary rights of local communities, including their land, livelihoods, and use of natural resources. It has established and implemented compliance management and risk control procedures to identify, prevent, monitor, and mitigate significant impacts from its activities, covering health and safety, social and cultural rights, and environmental effects.

CRITERION	RATING	COMMENT
		<p>The Entity collaborates with the Industrial Estate Management Committee and engages Stakeholders through consultations in the development of management plans, such as the safety and environmental contingency plans. Additionally, the Entity participates in and supports community welfare activities organised by the Committee, including public awareness campaigns on road safety, fire prevention, and fraud prevention.</p> <p>The primary impact on neighbouring populations is environmental, particularly air pollution from production activities. To address this, the Entity has developed an environmental control plan in compliance with legal requirements and regularly reports its progress to the Environmental Protection Agency. Relevant plans and reports are publicly available at: https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=082ac13f75e644bf84246e514e020b95</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity is committed to not using conflict minerals and has implemented a management system that includes supply chain mapping, risk assessments, control plans, Due Diligence audits, and reporting. Relevant employees receive training, and the Policy and requirements are communicated to suppliers. All suppliers must sign a commitment letter affirming their pledge to avoid using conflict minerals.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts a supply chain risk assessment to determine if materials originate from Conflict-Affected and High-Risk Areas (CAHRAs), based on supplier communications. The assessment report indicates that no materials come from such areas. All suppliers are based in China, and there are no critical Human Rights issues, such as Child Labour or Forced Labour within the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	Risk response is defined by the OECD Due Diligence Guidance for Minerals from CAHRAs. According to the risk assessment report, no materials originate from these areas, and no 'red flags' were identified in the supply chain. The Entity continues to maintain business relationships with all material suppliers.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	As part of the supplier Due Diligence process, the Entity identifies major next-tier suppliers, establishes an audit plan, conducts third-party audits at supplier sites, and applies CAHRAs as audit criteria. According to the risk assessment and supplier audit reports from 2023 and 2024, no materials are sourced from these areas and the risk of conflict minerals is low. The ASI Performance Standard Audit also satisfies this requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity publicly reports its supply chain Due Diligence performance on CAHRAs. The 2023 performance for CAHRAs is included in the Entity's Sustainability Report.
9.9 Security practice	Conformance	The Entity has established a management procedure to ensure security activities respect Human Rights. Security guards are stationed solely at the entrance gate for visitor management and are not authorized to conduct body searches or restrict Worker movement. Security guards receive training, and according to an interviewed guard, they understand their duties and how to uphold Human Rights.

CRITERION	RATING	COMMENT
		No Grievances or Complaints regarding security activities have been reported.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity demonstrates respect for the right to Freedom of Association and Collective Bargaining, allowing Workers' representatives to address their concerns with management on their behalf.
10.2a-c Child Labour	Conformance	Based on the Entity's work roster, site observations, and interviews with sampled Workers, the youngest employee in the Entity is currently 20 years old. No Child Labour was found. In China, the minimum working age is 16, and the Entity has implemented a Policy against Child Labour. Employee ages are verified through identification card checks and interviews, with copies of identification cards kept in personal files as proof of age verification.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy prohibiting Forced Labour, slavery, and Human Trafficking. It is committed to ensuring compliance with this Policy and expects the same from its suppliers. Based on Worker and management interviews, document reviews, and site observations, the Entity does not engage in or support Forced Labour or Human Trafficking, either directly or indirectly. Workers are hired directly by the Entity, without having to pay any fees or deposits. No loans are provided to Workers, and they retain control over their identity documents. The Entity respects Workers' freedom of movement and imposes no unreasonable restrictions. Workers may freely terminate their employment with prior notice.</p> <p>The Entity's Modern Slavery Statement is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcdn.ahzjalufail.com%2Fupload%2F20240910104321.docx&wdOrigin=BROWSELINK</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. Its recruitment advertisements and training plans emphasise that decisions are based solely on a candidate's ability to perform job requirements, not on personal characteristics, and ensure equal pay for equal work. Worker interviews confirm that all employees are treated equally, and no Discrimination cases have been reported.
10.5 Communication and engagement	Conformance	The Entity maintains direct and frequent communication with Workers and their representatives. It provides channels for Workers to raise complaints and concerns relating to working conditions, workplace issues, and compensation, ensuring there is no fear of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, ensuring disciplinary measures comply with legal requirements and require confirmation from the involved Worker(s). It does not tolerate corporal punishment, mental or physical coercion, Harassment, gender-based Violence, including

CRITERION	RATING	COMMENT
		sexual Harassment, or verbal abuse. The Violence and Harassment Policy is included in the Entity's ASI Policy at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910105101.doc&wdOrigin=BROWSELINK
10.7a-c Remuneration	Minor Non-Conformance	The Entity's wage structure is clearly defined, with the basic wage meeting the local legal minimum. Total compensation covers Workers' basic needs. Wage payments are documented, and all workers are paid on time via bank transfer on the 15 th of the following month. Payslips include detailed information on wages, allowances, Overtime compensation, and deductions. However, social insurance provisions do not current cover all Workers.
10.8a-c Working Time	Conformance	Working hours are recorded manually. Office staff and 30% of Workers have a regular 40-hour working week, spread over five days. For the remaining 70% of Workers, there are three groups on two shifts, working six consecutive days followed by two days off. Shifts rotate every two days. The average workday does not exceed eight hours over a six-month period. Working hours are monitored to ensure compliance with China Labour Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through orientation and ongoing training.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and maintains an Occupational Health and Safety (OH&S) Management System that is continuously improved over time. All sites within the Entity hold valid ISO 45001:2018 certifications, reflecting their commitment to OH&S. On-site observations, document reviews, and interviews with management and Workers confirm the OH&S Management System is effective in preventing workplace hazards, ensuring a safe and healthy environment, and complying with relevant regulations and standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity regularly evaluates its OH&S Management System using various methods, including monthly safety meetings, annual legal compliance checks, an internal audit based on ISO 45001:2018, and management review meetings. If a control gap is identified, a thorough analysis will be conducted to determine the need for corrective or preventive actions. This proactive approach ensures prompt resolution of any OH&S issues. To promote transparency, the Entity publishes its OH&S objectives and targets for 2023, along with performance comparisons to industry peers and best practices, in its annual Sustainability Report, page 10-13, at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fc n.ahzjalufol.com%2Fupload%2F20240910104829.docx&wdOrigin=BROWSELINK
11.2 Employee engagement on Health and Safety	Minor Non-Conformance	The Entity has formed a Health & Safety Management Committee that holds regular meetings to monitor facility conditions and promote improvements in health and safety practices. To gather employee feedback on OH&S, the Entity has implemented various communication channels, including suggestion boxes, Worker representative assemblies, and a social media 'mini'-programme. These channels encourage employees to report and actively address

CRITERION	RATING	COMMENT
		Health and Safety concerns. However, employee involvement in Health and Safety management remains insufficiently effective.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 March 2025	Initial Certification Audit – Provisional Certification