

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Binzhou Beihai Regal Advanced Material Co.,Ltd.

CERTIFICATE NUMBER  
**425**

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

CERTIFICATION  
LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**TÜV RHEINLAND  
CERT GMBH**

DATE OF ISSUE  
**21 FEBRUARY 2025**

DATE OF EXPIRY  
**20 FEBRUARY 2028**

CERTIFIED SINCE  
**21 FEBRUARY 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

High strength Aluminium alloy, rare  
earth Aluminium alloy, high thermal  
conductivity Aluminium alloy, high-  
temperature resistant Aluminium  
alloy and other new Aluminium  
alloy materials

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Binzhou Beihai Regal Advanced Material Co., Ltd.
ENTITY NAME	Binzhou Beihai Regal Advanced Material Co., Ltd.
CERTIFICATION SCOPE	High strength Aluminium alloy, rare earth Aluminium alloy, high thermal conductivity Aluminium alloy, high-temperature resistant Aluminium alloy and other new Aluminium alloy materials
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</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	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>22 – 23 October 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>3 December 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium ingot including the melting, casting at Binzhou Beihai Regal Advanced Material Co., Ltd., China.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul> <p>All relevant 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	21 February 2025 – 20 February 2028

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NEXT AUDIT TYPE                      Surveillance Audit

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NEXT AUDIT DATE                      20 August 2026

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CERTIFICATE NUMBER                      425

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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 was established in December 2017, and is located in the A5 Building of the Science and Technology Incubator Park, Weihai Economic Development Zone, Binzhou, Shandong, China. It specialises in the research, development, production, and sales of new Aluminium alloy processing technologies. The Entity is a wholly-owned subsidiary of Shanxi Regal Metal New Materials Co., Ltd., and occupies a total floor area of approximately 12,000 square metres (m<sup>2</sup>).

The main production process is casting, with a designed capacity of 120,000 tonnes per year and a current production of 88,000 tonnes per year. Its facilities include a single-story building for workshops and offices, housing four melting furnaces, one Dross cooler, one ball mill, one horizontal casting line, one vertical casting line, and one chain casting line. Supporting infrastructure includes warehouses for raw materials, semi-finished products, and finished products, as well as a water reuse treatment station, air compression station, Hazardous Waste warehouse, and general solid Waste warehouse.

The Entity currently employs 87 staff and engages key Stakeholders such as shareholders, customers, partners, upstream suppliers, and government agencies (including safety supervision, environmental protection, labour, and tax authorities).

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has established a procedure for collecting applicable laws and regulations. The Legal, Environment, Health and Safety (EHS), and Administration departments are responsible for reviewing and assessing relevant labour, ethics, Health & Safety, and environmental laws at least once per year. Additionally, a qualified law firm from the Entity's parent company assists in updating and evaluating these regulations.
1.2 Anti-Corruption	Conformance	<p>The Entity's ESG Management Manual includes a Business Ethics Policy and procedures, ensuring proper employee training. It also covers Anti-Corruption measures, available at: <a href="https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf">https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf</a></p> <p>The ethics reporting channel is publicly disclosed, available in the annual Sustainability Report, page 9, at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>A Due Diligence investigation is required for high-risk positions within the Entity, including the purchasing, sales, quality, and warehouse departments. All staff in these departments must sign an Honesty Commitment Letter. Additionally, an internal ethics audit is conducted every six months.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established an ESG Management Manual based on the ASI Performance Standard and provided training to all Workers in August 2024. The Manual, including Policies, is available at: <a href="https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf">https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf</a></p> <p>The Entity has distributed the Manual to its suppliers, which is acknowledged through signed commitment letters.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established Management System and an ESG Policy to ensure compliance with environmental, social and governance standards. Workers have received ESG Policy training, and external parties can access the Policy at: <a href="https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf">https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;ae&amp;ASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf</a>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	A Senior Management Representative has been appointed, and the responsibilities and authorities of each department and key role in implementing the ASI Performance Standard are defined.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an ISO 14001:2015 certified Environmental Management System. It has not received any fines or corrective action requests from Government agencies or Stakeholders.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented Social Management Systems and complies with legal requirements. An annual compliance evaluation has been conducted, with no fines or corrective action requests from Government agencies or other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that align with responsible sourcing requirements. The Supplier Code of Conduct is publicly available at: <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.regal-metal.com%2Fuploads%2F%26e8%26b4%269f%26e8%26b4%26a3%26e4%26bb%26bb%26e9%2687%2687%26e8%26b4%26ad%26e6%2696%26b9%26e9%2692%2688.docx&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.regal-metal.com%2Fuploads%2F%26e8%26b4%269f%26e8%26b4%26a3%26e4%26bb%26bb%26e9%2687%2687%26e8%26b4%26ad%26e6%2696%26b9%26e9%2692%2688.docx&amp;wdOrigin=BROWSELINK</a> and communicated with suppliers, addressing environmental, social and governance issues. A Due Diligence form has been used for suppliers' compliance with the Supplier Code of Conduct.</p> <p>In line with the parent company's Policy, the Entity conducts an annual management review. The purchasing Policies are also reviewed whenever significant changes in environmental, social or governance risks arise, or if control gaps are identified.</p> <p>The established procedures require the Entity to conduct on-site Due Diligence audits for major suppliers. The Entity and the parent company has completed the Due Diligence process for eight major suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established an emergency preparedness and response procedure, developed in collaboration with internal and external experts. It includes response and business recovery plans for various emergencies, such as fires, explosions, chemical spills, and strikes. An Emergency Response Team (ERT) has been formed, and the Entity conducts drills at least once per year. The Health and Safety Emergency Response Plan is available at: <a href="https://www.regal-metal.com/uploads/%e6%bb%a8%e5%b7%9e%e5%8c%97%e6%b5%b7%e7%91%9e%e6%a0%bc%e9%87%91%e5%b1%9e%e6%96%b0%e6%9d%90%e6%96%99%e6%9c%89%e9%99%90%e5%85%ac%e5%8f%b8%e5%ba%94%e6%80%a5%e9%a2%84%e6%a1%88.pdf">https://www.regal-metal.com/uploads/%e6%bb%a8%e5%b7%9e%e5%8c%97%e6%b5%b7%e7%91%9e%e6%a0%bc%e9%87%91%e5%b1%9e%e6%96%b0%e6%9d%90%e6%96%99%e6%9c%89%e9%99%90%e5%85%ac%e5%8f%b8%e5%ba%94%e6%80%a5%e9%a2%84%e6%a1%88.pdf</a></p> <p>The Environmental Emergency Response Plan is available at: <a href="https://www.regal-metal.com/uploads/%e6%bb%a8%e5%b7%9e%e5%8c%97%e6%b5%b7%e7%91%9e%e6%a0%bc%e9%87%91%e5%b1%9e%e6%96%b0%e6%9d%90%e6%96%99%e6%9c%89%e9%99%90%e5%85%ac%e5%8f%b8%e5%ba%94%e6%80%a5%e9%a2%84%e6%a1%88.pdf">https://www.regal-metal.com/uploads/%e6%bb%a8%e5%b7%9e%e5%8c%97%e6%b5%b7%e7%91%9e%e6%a0%bc%e9%87%91%e5%b1%9e%e6%96%b0%e6%9d%90%e6%96%99%e6%9c%89%e9%99%90%e5%85%ac%e5%8f%b8%e5%ba%94%e6%80%a5%e9%a2%84%e6%a1%88.pdf</a></p>

CRITERION	RATING	COMMENT
		<a href="#"><u>e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b8&amp;e7&amp;aa&amp;81&amp;e5&amp;8f&amp;91&amp;e7&amp;8e&amp;af&amp;e5&amp;a2&amp;83&amp;e4&amp;ba&amp;8b&amp;e4&amp;bb&amp;b6&amp;e5&amp;ba&amp;94&amp;e6&amp;80&amp;a5&amp;e9&amp;a2&amp;84&amp;e6&amp;a1&amp;88- &amp;e7&amp;bb&amp;88.pdf</u></a>
2.8a-d Suspended Operations	Conformance	The Entity has established a Management of Suspension of Operations framework, including a Business Resilience Plan, to address situations requiring operational suspension or significant alterations due to external factors. This Plan considers Material adverse environmental, social, and governance (ESG) impacts. The Entity reviews its Business Resilience Plan every five years, or whenever business changes affect the nature or scale of ESG risks. No significant changes have occurred at the Entity to date, so therefore no such reviews have been conducted.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established management control procedures for investments and Acquisitions. No Mergers or Acquisitions have currently been proposed.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review the environmental, social and governance issues during closure, decommissioning or divestment. Since the Entity's inception, no such instance has occurred.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainable Development Report, covering environmental, social and governance topics, is available at: <a href="https://www.regal-metal.com/uploads/e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf"><u>https://www.regal-metal.com/uploads/e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</u></a>
3.2 Non-compliance and Liabilities	Conformance	The Entity's Code of Ethics and Business Conduct mandates the annual public disclosure of Material fines, judgments, penalties, and non-monetary sanctions related to noncompliance with applicable laws. A review of official Government and Non-Governmental Organisation (NGO) websites confirms no recorded fines or compliance violations. From 2021 to 2024, the Entity has not incurred any significant fines, judgments, penalties, or sanctions.
3.3a-c Payments to Governments	Minor Non-Conformance	The Entity has established and implemented Policies, systems, and procedures that align with Anti-Corruption requirements. The Entity's Transparency and Anti-Corruption Policies and its annual financial report review ensures that all payments to the Government, such as social insurance fees, business taxes, and housing fund fees, are made in accordance with legal regulations and contractual obligations.  No additional payments are made, and all transactions comply with local laws. However, the Entity does not publicly disclose the detailed information of payments to Governments.
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity has established an Information Communication Control Procedure addressing both internal and external communications. Internal channels include training, posters, and the website, while external channels encompass meetings, signed commitments,

CRITERION	RATING	COMMENT
and Requests for Information		<p>assessments, telephone, and email. Public communication channels, including email or telephone, are accessible to both internal and external Stakeholders and are detailed in the Entity's Annual Sustainability Report, page 9, available at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>The Entity has established corrective action and preventive actions for all complaints and grievances.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has established processes and systems for conducting Life Cycle Assessments (LCA). The first LCA report was completed in March 2024 and prepared in accordance with ISO 14040:2006 and ISO 14044:2006 standards. The assessment addresses all Material inputs and environmental outputs, including air emissions, greenhouse gases (GHG), Wastewater, and solid Waste. However, the LCA was conducted using an 'averages approach', and did not differentiate by alloy type. Additionally, whilst GHG data were independently assessed by a third party it was not integrated into the LCA report.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has developed the LCA report for current products and the information is publicly available at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e4&amp;ba&amp;a7&amp;e5&amp;93&amp;81&amp;e7&amp;94&amp;9f&amp;e5&amp;91&amp;bd&amp;e5&amp;91&amp;a8&amp;e6&amp;9c&amp;9f&amp;e8&amp;af&amp;84&amp;e4&amp;bb&amp;b7&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e4&amp;ba&amp;a7&amp;e5&amp;93&amp;81&amp;e7&amp;94&amp;9f&amp;e5&amp;91&amp;bd&amp;e5&amp;91&amp;a8&amp;e6&amp;9c&amp;9f&amp;e8&amp;af&amp;84&amp;e4&amp;bb&amp;b7&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>Product carbon data has been published at: <a href="https://www.regal-metal.com/uploads/&amp;e9&amp;93&amp;9d&amp;e5&amp;90&amp;88&amp;e9&amp;87&amp;91&amp;e4&amp;ba&amp;a7&amp;e5&amp;93&amp;81&amp;e7&amp;a2&amp;b3&amp;e8&amp;b6&amp;b3&amp;e8&amp;bf&amp;b9&amp;e7&amp;ac&amp;ac&amp;e4&amp;b8&amp;89&amp;e6&amp;96&amp;b9&amp;e6&amp;a0&amp;b8&amp;e6&amp;9f&amp;a5&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e9&amp;93&amp;9d&amp;e5&amp;90&amp;88&amp;e9&amp;87&amp;91&amp;e4&amp;ba&amp;a7&amp;e5&amp;93&amp;81&amp;e7&amp;a2&amp;b3&amp;e8&amp;b6&amp;b3&amp;e8&amp;bf&amp;b9&amp;e7&amp;ac&amp;ac&amp;e4&amp;b8&amp;89&amp;e6&amp;96&amp;b9&amp;e6&amp;a0&amp;b8&amp;e6&amp;9f&amp;a5&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>The public information includes underlying assumptions and boundaries. However, product carbon data are not fully accurate, and supplier data are unavailable. The current LCA data only provides for a 'gate-to-gate' analysis.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	All Process Scrap is recycled internally. The Entity maintains a Scrap inventory to track relevant information and ensures clear separation by alloy grade. Scrap is only recycled by smelters of the same alloy grade, with labelled storage for proper collection and organisation.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has engaged with local recycling units to make efforts to increase recycling rates in automobile industry. The latest seminar on Aluminium recycling was held in May 2024 and the Entity had shared its Policies and strategy in the seminar. The Entity has developed



CRITERION	RATING	COMMENT
		various actions for improving the proportion of recycling Aluminium from End of Life, including cooperating with more recycling vendors.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has mandated a certified third party to calculate GHG emissions annually. The 2023 GHG verification report confirms that approximately 620,000 tonnes of CO<sub>2</sub>e were generated in 2023. The calculation covers all Material sources under Scope 1, 2, and 3, with 98.5% attributed to Category 4 of Scope 3 (materials purchasing). The 2023 GHG verification certificate has been published at: <a href="https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf">https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf</a></p> <p>The detailed GHG data, including energy sources, is disclosed in the 2023 Sustainability Development Report, page 22-24 and 32, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf">https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf</a></p> <p>However, as no primary data were collected, some emission factors used, such as those for liquid Aluminium, are inaccurate.</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	Minor Non-Conformance	<p>The Entity has set an intermediate GHG reduction target using the ASI GHG Reduction Pathway Tool, with a baseline year of 2023. Details are provided in its 2023 Sustainability Development Report, page 24-25, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf">https://www.regal-metal.com/uploads/677b3e6c/66b5b7e7919e6a0bc98791e5b19e6696b0e669d90e669699e669c89e99990e585ac6e58fb82023e58faf668c81e7bbad6e58f91e5b195e668a6a5e5918a.pdf</a></p> <p>The GHG Reduction Plan includes monthly tracking of emissions from energy and material purchases, with an annual review to assess progress. The first review, covering 2024 performance, is scheduled for March 2025. As of the Audit date, monthly tracking has been maintained.</p> <p>The Entity's GHG Management Procedure indicates that the Entity will reassess its Reduction Pathway if baselines or targets change. Over the past year, no such changes have occurred.</p> <p>However, the GHG Reduction Pathway slopes in the 2023 Sustainability Development Report do not fully align with the actual data.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity's GHG Management Procedure outlines Policies, reduction objectives, data tracking tools and review requirements. Currently, the Quality Department leads GHG reduction efforts. The Entity has established an Emissions Reduction Pathway using the ASI-provided tools and developed executable projects. Annual management reviews ensure these projects remain on track. The Entity also collaborates with the local Aluminium organisation to discuss GHG emissions. However, the Entity's performance management needs improvement, particularly with respect to data accuracy and information transparency.

## 6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has installed an air treatment system to ensure compliance with discharge regulations and maintains it in good condition. Air pollutants are monitored in accordance with legal requirements, with no exceedances detected in recent years. The Entity publishes quarterly air pollutant data on the Government website, available at: <a href="https://permit.mee.gov.cn/perxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&amp;dataid=54e2a1408b3e49d69ca376e4013b34e0">https://permit.mee.gov.cn/perxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&amp;dataid=54e2a1408b3e49d69ca376e4013b34e0</a></p> <p>The Entity's Waste Air Management Procedure outlines the process for addressing abnormal air quality results. Over the past two years, there have been no significant changes, and the Entity continues to monitor air emission reduction plans annually. The latest review conducted in July 2024 for 2023 performance, found no deviations from objectives or plans.</p> <p>The Entity has published its air quality improvement objectives and plans in its 2023 Sustainability Report, page 19, available at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>However, the Entity has not installed an air purification device in the Hazardous Waste warehouse, where Aluminium Dross is stored and generates ammonia gas. Currently, ammonia levels are controlled by limiting Dross storage to a maximum of one tonne.</p>
6.2a-g Discharges to Water	Conformance	<p>The primary source of industrial wastewater is the cooling system used in casting. This wastewater is fully recycled internally. Domestic wastewater is discharged into the local municipal system in compliance with legal requirements and is monitored quarterly by a certified third party. No exceedances have been detected in recent years.</p> <p>The Entity reports annual wastewater data in its 2023 Sustainability Report, page 25–26, available at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>The Entity has set reduction targets and improvement plans for wastewater, focusing on flux and Chemical Oxygen Demand (COD)</p>

CRITERION	RATING	COMMENT
		<p>per volume. These plans are reviewed annually. Over the past year, there were no control gaps or Material changes noted.</p>
<p>6.3a-g Assessment and Management of Spills and Leakages</p>	<p>Conformance</p>	<p>The Entity has conducted annual risk assessments for Leakage and Spills related to Waste air and water, liquid Aluminium, and chemicals, or whenever there is a Material change. The latest assessment, conducted in March 2024, identified no Material risks.</p> <p>An Emergency Response Team is in place for Leakage and Spill incidents, with annual drills conducted, with the most recent being completed in April 2024. No Leakages or Spills have occurred in the past two years, and no Material changes or control gaps have been identified. The Entity reviews Leakages and Spills management plans annually.</p> <p>Leakages and Spills data, along with preventive actions, are published in the 2023 Sustainability Report, pages 20 and 32, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p>
<p>6.4a-b Public Disclosure of Spills and Leakages</p>	<p>Conformance</p>	<p>The Emergency Response Control Process outlines procedures for reporting and handling Leakages and Spills. In the event of a Spill, the Emergency Response Team (ERT) follows a defined protocol, with annual drills ensuring the process remains up to date. The process includes promptly notifying affected parties, including neighbours, Local Communities, and government authorities.</p> <p>No Spills or Leakages have been reported in the past two years. Details on Spills and Leakages in 2023 are available in the 2023 Sustainability Report, page 32, at: <a href="https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p>
<p>6.5a-c Waste Management and Reporting</p>	<p>Conformance</p>	<p>The main solid Waste generated by the Entity includes Aluminium Dross, Waste-activated carbon and waste machine oil. All Waste is transferred to legally permitted vendors for Hazardous Waste disposal. Solid Waste details, including category, quantity, and disposal method, have published in the 2023 Sustainability Report, page 22, available at: <a href="https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>The Entity conducts an annual risk assessment for solid Waste management, with the latest assessment completed in April 2024. No Material risks to human well-being or the environment were identified. The Entity has also established improvement objectives and plans to reduce solid Waste. Waste mitigation performance is reviewed annually, with the most recent review conducted in July 2024.</p>

CRITERION	RATING	COMMENT
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	<p>The Entity has warehouses dedicated to Dross, with adequate signage, labels, and liquid Leakage collection devices in compliance with legal requirements. All Aluminium Dross is recycled using internal equipment, and final Dross is treated as Hazardous Waste according to local regulations.</p> <p>After initial recycling, the Dross is transferred to qualified vendors with the necessary legal permits. Investigative reports confirm that these vendors use Dross for further Aluminium recycling, with the final treated Dross residues used in manufacturing other products or sent to landfills.</p> <p>Three vendors dispose of the treated Dross residue through recycling or conversion into other materials. The Entity annually reviews Dross management performance, with the latest review conducted in July 2024.</p>

## 7. WATER STEWARDSHIP

7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has implemented water mapping and regularly reviews updates and changes. Water risk assessment is conducted annually, with the latest assessment completed in March 2024. No Material risks were identified, and the overall risk is ranked as Low. The water source is the local municipal water plant, with no use of underground water, rivers, or lakes. Water withdrawal and risk assessment details have been published in the 2023 Sustainability Report, page 25-26, available at: <a href="https://www.regal-metal.com/uploads/attachment_data/file/108791/9e6a0bc9e8791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58f8af9e68c81e7bbad9e58f91e5b195e68a9a5e5918a.pdf">https://www.regal-metal.com/uploads/attachment_data/file/108791/9e6a0bc9e8791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58f8af9e68c81e7bbad9e58f91e5b195e68a9a5e5918a.pdf</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, 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	<p>The Entity has conducted an impact assessment on Biodiversity and Ecosystem Services from the land use and activities within its Area of Influence, as outlined in the Environmental Impact Assessment (EIA) Report prepared by a third-party agency. The EIA was approved by the local environmental bureau, and the results indicate that the impact on Biodiversity and Ecosystem Services is minimal, requiring no further action. The latest EIA approval was granted in December 2021. The Entity has reviewed the environmental conditions related to Biodiversity and Ecosystem Services annually, and there have been no changes since the EIA approval.</p>
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable as the impacts on Biodiversity and Ecosystem Service are assessed as low.

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as the impacts on Biodiversity are assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable 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 established a Policy to prevent the introduction of Alien Species and has conducted a risk assessment of its activities (e.g. package material purchasing, transporting, afforestation). The assessment results indicate no Material risks relating to the introduction of Alien Species.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	There are no World Heritage Properties within the Entity's Certification Scope. The ESG Management Manual outlines that the Entity conducts annual management review of the No-Go Policy for World Heritage Properties. The latest management review was conducted in March 2024.
8.6a-d Protected Areas	Conformance	<p>The Entity has conducted impacts assessment on Protected Areas within its Area of Influence as part of the Environment Impact Assessment (EIA) Report, conducted by a professional third party. The EIA approval from the local environmental bureau was obtained in December 2021. The assessment concluded that no Protected Areas are in the area.</p> <p>The Entity reviews Protected Areas regulated by national and local Governments annually, and no changes have occurred since the previous approval. The Entity also monitors Protected Area information in the local city and will prioritise migration if any area is designated as a Protected Area in the future. Details on Protected Areas are available in the 2023 Sustainability Report, page 26-27, at: <a href="https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p>
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 established an ESG Management Manual to uphold Human Rights, promote gender equality, and comply with the UN Guiding Principles on Business and Human Rights. The Manual is available at: <a href="https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86">https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86</a>

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		<p><a href="#">&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;aeASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf</a></p> <p>The Entity has identified the Human Rights risks and provided training to all employees. The Entity has also established a procedure for conducting Human Rights Due Diligence. The implementation of the Human Rights Policy and relevant performance are reviewed annually in management meetings. The Entity also commits to reviewing the Policy in response to changes in Material Human Rights risks or control gaps.</p> <p>According to the Human Rights impact assessment, management review meeting records and Stakeholder Grievances records, the Entity's operations have not caused or contributed to significant adverse Human Rights impacts. The Entity is committed to providing remediation and/or cooperation in legitimate processes if any negative impact on Human Rights is identified or reported.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity is committed to protecting female Workers and promoting gender equity and women empowerment, as outlined in its ESG Management Manual. It respects women's rights and supports work-life balance initiatives, particularly for female employees. Female Workers are not assigned to hazardous roles prohibited by the Special Rules on Labor Protection of Female Employees, such as underground mining or heavy physical labour.</p> <p>There is no gender-based pay disparity, and female Workers receive equal compensation. The Entity ensures adequate protections for pregnant and nursing employees, including well-equipped nursing rooms. Gender equity Policies and performance, including protections for female Workers, are publicly disclosed in the ESG management manual, available at: <a href="https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;aeASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf">https://www.regal-metal.com/uploads/3&amp;e9&amp;93&amp;9d&amp;e4&amp;b8&amp;9a&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e5&amp;80&amp;a1&amp;e8&amp;ae&amp;aeASI&amp;e7&amp;bb&amp;a9&amp;e6&amp;95&amp;88&amp;e6&amp;a0&amp;87&amp;e5&amp;87&amp;86&amp;e8&amp;ae&amp;a4&amp;e8&amp;af&amp;81V3&amp;e7&amp;89&amp;88&amp;e7&amp;ae&amp;a1&amp;e7&amp;90&amp;86&amp;e6&amp;89&amp;8b&amp;e5&amp;86&amp;8c11.pdf</a></p> <p>However, the Entity does not publicly disclose the effectiveness of the measures taken to promote gender equity in the Sustainability Report.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable 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 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 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 as there are no Indigenous Peoples in the Entity's Area of Influence.

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9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located in an industrial park and not near any Cultural and Sacred Heritage sites, and no renovation or expansion projects are currently planned. The Entity however has established a program to protect Cultural and Sacred Heritage sites,.
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 there have been no Major Changes or New Projects causing resettlements. The Entity has not undertaken any New Projects, and no physical or economic Resettlements are relevant.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established a Stakeholder engagement process to identify key concerns of Affected Populations and Organisations. It has assessed the associated risks and developed plans to address these concerns, including support for local community development. These plans are reviewed annually, with improvements made as necessary.</p> <p>Management plans for surrounding communities have been published, detailing measures to mitigate any significant social, cultural, Human Rights, or environmental impacts from production activities. Details are included in the Annual Sustainability Report, page 17, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Supplier Code of Conduct to prohibit the use of conflict minerals and implemented a Management System. Relevant employees have received training, and the Policy and requirements are communicated to suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Conflict-Affected and High-Risk Areas (CAHRAs) have been identified, and measures have been taken to advise, train, and alert higher-risk suppliers. CAHRAs do not impact the Entity's Business or purchasing activities.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a procedure to manage the risk of CAHRAs. This includes sourcing management and supplier surveys focused on CAHRA management. The Purchasing Policy, aligned with the ASI Performance Standard, mandates communication with all suppliers and contractors, addressing environmental, social, and governance aspects. The Entity has also developed and implemented sourcing strategies to mitigate identified risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited against the ASI Performance Standard. Records confirmed no risk of CAHRAs in the Entity's supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has implemented a Supplier Code of Conduct, conducted a risk assessment, and completed a social responsibility audit of its supply chain. It ensures that no conflict materials are used, and no

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		materials originate from CAHRAs. Supplier management is disclosed in the annual Sustainability Report, available at: <a href="https://www.regal-metal.com/uploads/66bb8e5b79e5e58c97e6b5b7e7919e6a0bc9e98791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58faf9e68c81e7bbad9e58f91e5b195e668a9a5e5918a.pdf">https://www.regal-metal.com/uploads/66bb8e5b79e5e58c97e6b5b7e7919e6a0bc9e98791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58faf9e68c81e7bbad9e58f91e5b195e668a9a5e5918a.pdf</a>
9.9 Security practice	Conformance	Security personnel are employed by the Entity, which has established Security Personnel Duties to uphold Human Rights. All security staff receive training on the Human Rights Policy and procedures, including anti-Harassment, anti-abuse, and anti-Forced Labour Policies. Employee interviews confirmed no Human Rights violations, and all security practices comply with Human Rights standards.
<b>10. LABOUR RIGHTS</b>		
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 senior management of the Entity is committed to upholding the rights to Freedom of Association and Collective Bargaining. All employees are members of the Worker Committee, which holds regular meetings with senior management to discuss and negotiate employee rights and benefits. Worker representatives are freely elected by the employees.
10.2a Child Labour	Conformance	The Entity has established a Protection of Underage Workers Procedure in accordance with ILO Conventions C138 and C182, which prohibits the employment of Child Labours under 15 years old and the engagement of underage Workers, who are below 18 years old, in hazardous work. The Entity's youngest employee is currently 23 years old.
10.3a-c Forced Labour	Conformance	The Entity has implemented a Policy prohibiting Forced Labour and Human Trafficking. The Entity is committed to this Policy and expects the same commitment from its suppliers. No instances of illegal wage deductions, Debt Bondage, or Forced Labour have been identified or reported.  A Modern Slavery Statement is included in the Sustainability Report, page 14, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/66bb8e5b79e5e58c97e6b5b7e7919e6a0bc9e98791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58faf9e68c81e7bbad9e58f91e5b195e668a9a5e5918a.pdf">https://www.regal-metal.com/uploads/677b3e6c/66bb8e5b79e5e58c97e6b5b7e7919e6a0bc9e98791e5b19e6696b0e69d90e69699e69c89e99990e585ac9e58fb82023e58faf9e68c81e7bbad9e58f91e5b195e668a9a5e5918a.pdf</a>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. Recruitment advertisements, training and promotion opportunities, and termination records confirm that decisions are based solely on candidates' job performance, not personal characteristics. Payment records reflect equal pay for equal work. Workers interviewed confirmed they feel treated equally, and no Discrimination cases have been reported. The Entity has disclosed its gender equity performance in its annual Sustainability Report, available at: <a href="https://www.regal-">https://www.regal-</a>



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		<a href="https://www.regal-metal.com/uploads/66&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">metal.com/uploads/66&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a>
10.5 Communication and engagement	Conformance	The Entity encourages Worker participation in the ESG management system and fosters direct, frequent communication with Workers and their representatives. Interviewees indicated the positive working climate and open communication. The Entity also holds quarterly meetings with Worker representatives to seek feedback, and Workers can report concerns through various channels, including a suggestion box, email, and hotline.
10.6a-g Violence and Harassment	Conformance	The Entity prohibits all forms of Violence and Harassment. With Worker participation, it has identified and assessed related risks and implemented preventive measures. All Workers receive training on reporting procedures. No instances of Violence and Harassment have been reported or identified in the past three years. The Entity's Violence and Harassment Policy is included in its annual Sustainability Report, page 14, available at: <a href="https://www.regal-metal.com/uploads/677b3e6c/66&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/66&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a>
10.7a-c Remuneration	Conformance	The Entity and its Workers sign labour contracts within one month of employment. These contracts comply with labour laws, ensuring a clearly defined wage structure where the basic wage meets or exceeds the legal minimum. Total compensation covers Workers' basic needs. Overtime pay follows legal requirements: 150% of the regular wage for Overtime on workdays, 200% on weekends, and 300% on public holidays. All employees are enrolled in both social insurance and the housing fund. Wages are paid monthly in a timely manner.
10.8a-c Working Time	Conformance	Working hours at the Entity are recorded and tracked. The regular working hours are 8 hours a day, 5 days a week, with a total of 40 hours per week. Overtime is regulated to remain within legal monthly limits, and all Workers receive at least one day off per seven-day period.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through orientation training, the Employee Handbook, on-site notice boards and periodic communications.
<b>II. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has obtained ISO 45001:2018 certification, which is published at: <a href="http://cx.cnca.cn/CertECloud/result/skipDetail?rzjgid=CNCA-RF-2015-66&amp;certNumber=135450%2FB%2F0001%2FUK%2FZH&amp;showtemp=1&amp;etlid=&amp;lot_number=6017a5c0353948fd9596cb2d5203d5e2&amp;pass_token=b864e7010bbbc5ab1481c2323acd22f2fee63df04eb0f022f218958abe9c1d62&amp;gen_time=1729560111&amp;captcha_output=8QNLp6AvLZbi7f4wteYFA-2-gosBStDemmdcptBPj5oybQvjNzUx34gR2VNQLRhoNLUTILQXUctAkm3tU">http://cx.cnca.cn/CertECloud/result/skipDetail?rzjgid=CNCA-RF-2015-66&amp;certNumber=135450%2FB%2F0001%2FUK%2FZH&amp;showtemp=1&amp;etlid=&amp;lot_number=6017a5c0353948fd9596cb2d5203d5e2&amp;pass_token=b864e7010bbbc5ab1481c2323acd22f2fee63df04eb0f022f218958abe9c1d62&amp;gen_time=1729560111&amp;captcha_output=8QNLp6AvLZbi7f4wteYFA-2-gosBStDemmdcptBPj5oybQvjNzUx34gR2VNQLRhoNLUTILQXUctAkm3tU</a>

CRITERION	RATING	COMMENT
		<p><a href="#">RFpu6hElmEF8blW5t6KtyewJ_z9uLPQIYQUySrijrgalCSZk8uhZ230fj7px5yJSrmCzYRJRmZmcScflivleirJqhpyq2-2oChIMJBbk4FU4RofgMf4VPRpPzitiE64h_I9jaBZU7J8TUozRWADh0Ruc4LMq_wZ6cXBsH_9HHiKoFB0K3ik3auLred5x7ODTzcmbFqshFNB-mJG9rl4j-zBPiadcDvPHfvzkFXVWL3byU7LCdIAZ2vsmgWm7z-qftoj8x4cYdM6R_7FNVif6KdujeEmmodQFjZsZqllg8r3WTHxgUwMKG9EhJlEj6_qV7sxroHGbzA9o9vDVuo70VKB0tzGq56oOzmVIG4IKVNG</a></p> <p>The latest ISO 45001 certification audit, conducted in May 2024, identified only one minor finding related to occupational disease hazard notices. This issue has since been fully corrected, and no similar findings were noted during the ASI Audit.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has conducted an annual management review of the OH&amp;S system or whenever there is a Material change in risk level or a control gap. The Entity also reviews OH&amp;S performance data, including injury and training indicators, on an annual basis. This information is publicly available in the 2023 Sustainability Report, page 19, at: <a href="https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf">https://www.regal-metal.com/uploads/677b3e6c/&amp;e6&amp;bb&amp;a8&amp;e5&amp;b7&amp;9e&amp;e5&amp;8c&amp;97&amp;e6&amp;b5&amp;b7&amp;e7&amp;91&amp;9e&amp;e6&amp;a0&amp;bc&amp;e9&amp;87&amp;91&amp;e5&amp;b1&amp;9e&amp;e6&amp;96&amp;b0&amp;e6&amp;9d&amp;90&amp;e6&amp;96&amp;99&amp;e6&amp;9c&amp;89&amp;e9&amp;99&amp;90&amp;e5&amp;85&amp;ac&amp;e5&amp;8f&amp;b82023&amp;e5&amp;8f&amp;af&amp;e6&amp;8c&amp;81&amp;e7&amp;bb&amp;ad&amp;e5&amp;8f&amp;91&amp;e5&amp;b1&amp;95&amp;e6&amp;8a&amp;a5&amp;e5&amp;91&amp;8a.pdf</a></p> <p>However, the Entity does not currently disclose performance data on near-misses.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established an EHS Committee overseen by the General Manager. The committee is democratically elected and has received EHS training. It holds monthly meetings to address EHS issues. Employees can raise concerns directly or via a suggestion box, with a reward system in place for meaningful reports. Meeting minutes, rewards, and issue tracking records are well maintained.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	21 February 2025	Certification Audit – Full Certification