

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hebei New Lizhong Nonferrous Metals Group Co., Ltd

CERTIFICATE NUMBER
431

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM

**SGS-CSTC STANDARDS
TECHNICAL SERVICES**

DATE OF ISSUE
13 MARCH 2025

DATE OF EXPIRY
12 MARCH 2028

CERTIFIED SINCE
13 MARCH 2025

AUTHORISED BY

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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Design and manufacture of
Aluminium alloys, Aluminium
master alloys and silicon-
Aluminium dispersion composite
materials through melting,
powdering, hot isostatic pressing
and machining processes at Hebei
New Lizhong Nonferrous Metals
Group Co., Ltd, Hebei Province,
China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lizhong Group
ENTITY NAME	Hebei New Lizhong Nonferrous Metals Group Co., Ltd
CERTIFICATION SCOPE	Design and manufacture of Aluminium alloys, Aluminium master alloys and silicon-Aluminium dispersion composite materials through melting, powdering, hot isostatic pressing and machining processes at Hebei New Lizhong Nonferrous Metals Group Co., Ltd, Hebei Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">19 – 20 November 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 December 2024
AUDIT SCOPE	<p>The Audit Scope included the design and manufacture of Aluminium alloys, Aluminium master alloys and silicon-Aluminium dispersion composite materials at Hebei New Lizhong Nonferrous Metals Group Co., Ltd located in Hebei Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 13 March 2025 - 12 March 2028

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 12 September 2026

CERTIFICATE NUMBER 431



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Hebei New Lizhong Nonferrous Metals Group Co., Ltd (the 'Entity') was created in November 2019 following a strategic restructure and name change from Bei Lizhong Nonferrous Metals Group Co., Ltd., which was founded in 1984. The Entity produces special high-strength Aluminium alloys for car wheels and engines. It has a registered capital of 534 million yuan and currently employs more than 120 people, including more than 50 professional technical personnel.

The Entity is located in the western area of the Economic Development Zone, Qingyuan District, at No. 338, Development Road, Qingyuan District, Baoding City, Hebei Province. The area surrounding the Entity, across a 500 metre radius is primarily industrial enterprises, and there are no environmentally sensitive areas including residential locations.

The Entity has nine sets of Aluminium alloy melting furnaces, and the current annual production capacity of high-strength Aluminium alloy products is 160,000 tonnes, of which 80% is used to produce automobile wheels and parts, and 20% is used for products applied to high-speed rail, electrical appliances, consumer electronics, communication electronics, high-end equipment, ships and other fields. The Entity's silicon-Aluminium dispersion composite new material business department specialises in the research and development of silicon-Aluminium alloys and their devices, Aluminium-based composite materials, microcrystalline Aluminium alloys and 3D printing Aluminium alloy materials, which has an annual production capacity of 100 tonnes. The products are mainly used in optical, high-end precision equipment, target materials and 3D printing fields.

It can produce dozens of varieties of Casting Aluminium alloy ingots that meet the standards of the Aluminum Association (AA), Japanese JIS standards, China National Guobiao Standards (GB), and other industry standards. The products are sold to more than 20 Provinces across China, and are exported to Japan, South Korea, the United Kingdom, Italy, and other countries and regions.

The Entity has obtained ISO 9001, IATF 16949, ISO 14001, ISO 45001, ISO 50001, and the second-level safety standard enterprise certifications.

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	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	High	Medium	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain awareness and ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	<p>The head of the Entity's management department, under the guidance of the Lizhong Group supervision department, collects and handles complaints and reports. The Entity has implemented the Lizhong Group anti-Bribery code of ethics and identified relevant job risks and a list of key roles.</p> <p>The Entity's internal Complaint Management Mechanism is operating effectively, and is disclosed at: http://www.lizhong.com.cn/uploads/tiny/mce/images/3679f0711720201a47e6f317ea620ccc673c1d544ab4b.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct covering principles relevant to environmental, social and governance performance, which was signed off by senior management, available at: http://www.lizhong.com.cn/uploads/tiny/mce/images/8c276f3b12252d04f7e5e677f4b6d510672eacea30e53.pdf</p> <p>An ASI internal audit and management review is conducted annually to ensure the normal and effective operation of the Entity's Management System.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has established and implemented an Environmental, Social, and Governance (ESG) Policy and related Policies addressing environmental, Occupational Health and Safety, ASI-related performance and energy. The General Manager has approved each of the Policies. The ESG Policy is internally communicated via training and is available on the notice boards in the plant. The Policies are reviewed annually and are available at: http://www.lizhong.com.cn/uploads/tiny/mce/images/8c276f3b12252d04f7e5e677f4b6d510672eacea30e53.pdf</p> <p>However, it was identified that only the EHS Policy had been communicated to the hazardous waste transport service provider and that the ESG Policy had not been communicated.</p>
2.2a-c Leadership	Conformance	The Entity has appointed the Director of Management as the ASI Management Representative, who has overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standards.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has developed and implemented an ISO 14001:2015 certified integrated Management System, which addresses the requirements of an Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an integrated Management System and has obtained certification to ISO 45001 and SA8000:2014. The Entity's Management Systems Manual has been implemented to manage risks to Human Rights and Labour Rights.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues. The Entity's Management Systems Manual details the requirements for review of the Policy. The Policy is available at: http://www.lizhong.com.cn/uploads/tinymce/images/3b8aab40f0d378deae216d22753f9332672eefbc5315a.pdf
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. However, the Entity has developed a procedure to identify and assess Human Rights risks. The Human Rights Impact Assessment Report is available at: http://www.lizhong.com.cn/uploads/tinymce/images/51b0b45288e07de90877fb0817953988672eef9228d7b.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Preparedness and Response Control Procedures, available at: http://www.lizhong.com.cn/uploads/tinymce/images/f2089f9c9bc8ff8ccef587db3d515ec2672ef1188d92c.pdf The Entity has an Emergency Response Plan that has been filed with the local government, Qingyuan District Emergency Management Bureau of Baoding City. It is stipulated that the Entity must review, update and file the plan every three years.
2.8a-d Suspended Operations	Conformance	The Entity has established a Suspended Operations Management Regulation and Business Resilience Plan. There have been no changes to the Business or control gaps identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure to review environmental, social and governance issues as part of the Due Diligence process for mergers and acquisitions. There are no merger or acquisition activities at the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There are no closure, decommissioning or divestment activities at the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its Environmental, Social and Governance Report for 2023, available at: http://www.lizhong.com.cn/uploads/tinymce/images/69cb3f8319c04f5860ff3e63a6bc490d672ebcacdc799.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has no fines or penalties imposed and promptly addresses issues raised during on-site inspections by the government. After handling them, feedback is communicated to government departments.

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>This Entity makes payments to government in accordance with the law and is subject to annual financial audits. The Financial Audit Report for 2023 is available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/4e83629e92363385e4384f6da4ad452167b6ba0e45933.pdf</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/138c54362b43cd0366e334b1076583d9672ef1b54c295.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented accessible, transparent, understandable and culturally sensitive Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/3679f0711720201a47e6f317ea620ccc673c1d544ab4b.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has two Product lines; one for Aluminium alloys and the other for silicon-Aluminium dispersion products and has developed a Life Cycle Assessment (LCA) for its cast Aluminium alloy Products conversion, available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/41a48abd9ce00418bd31a1dc7200ebbc672eef32a0c83.pdf</p> <p>The silicon-aluminium dispersion products are in trial production, with LCAs planned for 2025.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has established LCA management regulations to respond to customer requests. The Entity has two Product lines; one for Aluminium alloys and the other for silicon-Aluminium dispersion products. The LCA, which included a 'cradle-to-gate' boundary, determined that one kilogram of ADC12 series Aluminium alloy results in a product carbon footprint of 1.41 kilograms of carbon dioxide equivalent (CO₂e).</p> <p>However, the report does not include baseline assumptions nor a sensitivity analysis. The LCA report has been published on the company's website and is available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/41a48abd9ce00418bd31a1dc7200ebbc672eef32a0c83.pdf</p>
4.2 Product Design	Conformance	<p>The Entity has implemented product development planning and control procedures to consider the harmful impacts on the environment and social safety. They track the environmental and social safety goals to improve the sustainability of products and manufacturing processes. All product designs are selected and analysed according to the components provided by customers, and recycled materials are used to the maximum extent.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The on-site inspection confirmed that the Entity has classified the Process Scrap according to the types and grades of Aluminium products and recycled them. The recycling rate of Process Scrap is 100%.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material	Minor Non-Conformance	<p>The Entity has established an annual plan for recycling Aluminium Scrap from blocks or Aluminium chips. From 2023 to 2025, the production process waste and recycling targets are clear. The Aluminium Scrap/Chip Recycling Plan is available at:</p>

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		<p>http://www.lizhong.com.cn/uploads/tinymce/images/3210396836476a7af961d2eb9d17af03672ef1e1590d6.pdf</p> <p>However, a recycling strategy for Post-Consumer Scrap has not been established.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity purchases bulk Scrap, including scrap automobile wheels, mould materials, and automobile parts, to re-melt. Defective products (including scrap and products returned from their processes) are one of the sources of raw material in the Entity's Aluminium recycling strategy.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity engaged a consulting agency to assess its Greenhouse Gas (GHG) emissions and energy use. The 2023 Greenhouse Gas Inventory Report, which includes Scopes 1-3, was independently verified by a Third Party (TÜV). The 2023 Greenhouse Gas Emissions Inventory Report is publicly disclosed at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/2c5be16358fd10fd00b706a4e70be31c672eae3eb19b1.pdf</p> <p>The GHG Inventory Verification report is available at:</p> <p>http://www.lizhong.com.cn/article/show/350.html</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 published time-bound GHG emissions reduction targets with a GHG Emissions Reduction Plan to achieve the targets that includes actions to address both Direct and Indirect GHG emissions. The Entity has used the ASI Entity-level GHG Pathways Method and Calculation Tool to calculate the 2024-2027 Casting process slope and Casting procurement slope, with 2023 as the base year.</p> <p>The GHG Emissions Reduction Plan with Intermediate Targets has been disclosed at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/a0d26922fbd44da5d1db3230b9697d93672eefef80af4.pdf</p> <p>Additional emission reduction measures include energy management, fuel substitution, refrigerant management, and purchase of carbon quotas.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established the 'Life Cycle Assessment Management Regulations' and implemented the GHG Emissions Reduction Plan, reducing emissions from raw materials, production processes, and energy resources to achieve performance consistent with the reduction plan and goals.

6. EMISSIONS, EFFLUENTS AND WASTE

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The main atmospheric pollutants emitted by the Entity include particulate matter, sulphur dioxide (SO₂), and nitrogen oxides (NO_x). The Entity has online testing capabilities and regularly monitors atmospheric pollutants as required. Emissions to Air are managed through the ISO 14001:2015 certified Management System. The Entity has installed emission purification facilities according to the Environmental Impact Assessment (EIA) report to mitigate adverse effects.</p> <p>The plans for reducing atmospheric pollutants are detailed in the 2023 Pollutant Emissions and 2024 Emissions Reduction Plan, available at: http://www.lizhong.com.cn/uploads/tiny/mce/images/6ee3ddb07c84e29871c3668f6dcf5eb3672ebc7bc222d.pdf</p> <p>However, the description of the measures to reduce air pollutants in the published emission reduction plan for 2024 lacks detail; the measures are unclear regarding photovoltaic power generation, wind power generation, and green power procurement.</p>
6.2a-g Discharges to Waters	Conformance	<p>The Entity's production wastewater is recycled and is not discharged. Domestic sewage is treated by septic tank sedimentation with minimal environmental impact and discharged to the Qingyuan District Sewage Treatment Plant.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed the main operational risk areas for Spills and Leakages that could contaminate air, and water. The production wastewater is recycled, and there is no off-site discharge.</p> <p>The Entity has established procedures to assess Spills risks annually. To date, no Leakages or Spills have occurred, and the relevant Emergency Response Plan is disclosed at: http://www.lizhong.com.cn/uploads/tiny/mce/images/f2089f9c9bc8ff8ccef587db3d515ec2672ef1188d92c.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established a Production Safety Emergency Plan and Emergency Preparedness and Response Control Procedure, which stipulates that in the event of a leak, the heads of surrounding villages must be notified of the potential impact and affected persons. The Entity has declared there were no Spills or Leakages in the 2023 ESG Report, page 88: http://www.lizhong.com.cn/uploads/tiny/mce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management programme that defines its Waste management strategies, including how to minimise, reuse, sort and dispose of Waste. A waste disposal risk assessment has been carried out. Recyclable Waste is sold for reuse, and a disposal agreement is in place.</p> <p>All Hazardous Waste and solid waste generation and transfer data are recorded in the Hebei Province Solid Waste Dynamic Information Platform (https://218.12.94.182:81/index.jsp) and within the 2023 ESG Report, page 51: http://www.lizhong.com.cn/uploads/tiny/mce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
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 established and implemented a Hazardous Waste pollution prevention and control responsibility system. During each on-site inspection, waste residues such as Aluminium ash are stored in a dedicated warehouse and are labelled. The warehouse floor is leak-proof to prevent waste residues and leachate from being discharged into the environment.</p> <p>A treatment agreement with a service provider result in the residue being used as a raw material for building materials.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>Most of the water used by the Entity is primarily for circulating cooling in the production workshop, while additional water is utilised for restrooms, guardrooms, and greenery. The Entity has developed a Water Balance Test Report which shows that the water risk is low, available at: http://www.lizhong.com.cn/uploads/tinymce/images/c3421c1222a11d5ce52dfc7144f5073c672ef0a51d139.pdf</p> <p>The Entity has publicly disclosed its water withdrawals and consumption annually. The water risk assessment has been disclosed in the 2023 ESG Report, page 48: http://www.lizhong.com.cn/uploads/tinymce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Water Balance Test Report determined the water risk is low, however, they continue to monitor water intake and water use annually.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services covering geographical location, topography, engineering and hydrological addresses, climate, soil vegetation, mineral resources, and social environment. Overall, Biodiversity and Ecosystem Services Risk assessment and potential impacts were evaluated as low.</p> <p>The relevant control measures have been implemented as outlined in the Biodiversity Assessment Report, page 6: http://www.lizhong.com.cn/uploads/tinymce/images/5c6c60615611b085344736fba6a30cb8672ef044d23de.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low. There are no identified Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity and control requirements are established.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity is located in a government-designated industrial zone and has a documented commitment not to explore or build New Projects on or near World Heritage sites.
8.6a-d Protected Areas	Conformance	The Entity is located in a government-designated industrial zone that is not located within or near a Protected Area, and its production and Business Activities are carried out within the industrial zone.
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 established a Human Rights Policy that embodies respect for Human Rights and gender equality. The Entity has identified potentially Affected Populations and Organisations, including internal employees, external persons, suppliers, and service providers. The organisation has established the Human Rights Due Diligence Regulations and the Complaints Resolution Mechanism. The Entity’s gender equality and women’s rights plan is reviewed annually and/or when any changes or control deficiencies occur. Management and employee interviews undertaken during the Audit confirmed that no Human Rights violations have occurred.</p> <p>The Entity has established a Human Rights Impact Commitment Letter, however, there is no requirement for the regular review of the Policy commitments:</p> <p>http://www.lizhong.com.cn/uploads/tiny/mce/images/9ffa85c41fc9465f5f47231a58529b4a672eef6ce5d06.pdf</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Entity practices equal pay for equal work, there are no gender restrictions in recruitment processes and there are no gender Discrimination clauses in contracts. An inspection of the employment contracts was carried out in mid-2024 and no gender Discrimination or violation of women’s rights was found.</p> <p>Initiatives include recognition of and half a day’s leave for International Women’s Day and a breastfeeding room is provided.</p> <p>The Entity’s Human Rights Impact Commitment is available at: http://www.lizhong.com.cn/uploads/tiny/mce/images/9ffa85c41fc9465f5f47231a58529b4a672eef6ce5d06.pdf</p> <p>Gender equity and women’s empowerment disclosures are available in the 2023 ESG report, pages 62-68:</p>

CRITERION	RATING	COMMENT
		http://www.lizhong.com.cn/uploads/tinymce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
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's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has conducted an Environmental Impact Assessment that addresses sacred and/or cultural heritage sites and values within the Entity's Area of Influence. There are no cultural heritage sites or religious holy sites impacted by the Entity's activities.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located in an industrial park and does not have any New Projects or Major Changes that require resettlement. However, the Entity has established a relocation control procedure.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as it is located within government-designated industrial land, and there are no Affected Populations or Organisations.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Conflict Minerals Management Regulation, which clearly states that procurement should identify supply chain risks and propose response plans. At present, all suppliers are based in China.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a risk assessment and based on management interviews and inspection of purchase orders, it was confirmed that the Entity purchases Aluminium as raw material from manufacturers in China. The risk assessment results determined that the risk regarding armed conflict or Human Rights violations in the Entity's supply chain is low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as raw Aluminium material is sourced from China, and the risk assessment determined there is a limited risk of armed conflict or Human Rights abuses in the Entity's supply chain.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices and risk assessment were reviewed as part of the ASI Performance Standard Certification Audit, which addresses the requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established conflict mineral management regulations, conducted risk assessments and disclosed their supply chain Due Diligence activities in the 2023 ESG report, page 30: http://www.lizhong.com.cn/uploads/tiny/mce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf
9.9 Security practice	Conformance	The Entity has implemented a 'Security Practices Procedure' that requires security guards to respect Human Rights. All security guards have received training on the Human Rights requirements. There are no identified security-related Human Rights violations or complaints.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the Entity follows Applicable Laws regarding Freedom of Association and Collective Bargaining in China. The Entity commits itself to respect Workers' rights and an association for Workers was established in accordance with legal requirements.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established regulations regarding Freedom of Association and Collective Bargaining. The Entity does not have a Trade Union but has employee representatives who have been elected through an election process. Workers' representatives represent the concerns of employees to management on their behalf.
10.2a Child Labour	Conformance	The Entity has established a Policy prohibiting the use of Child Labour. There is no Child Labour or young Workers (16 to 18 years) in the Entity, with the youngest Worker confirmed to be 22 years old.
10.3a-c Forced Labour	Conformance	The Entity has established the 'Prohibition of Forced Labor Procedure' and a Policy on Modern Slavery and Human Trafficking. The Policy applies to the Entity and its suppliers and emphasises the importance of compliance with the prohibition of Forced Labour, slavery, and Human Trafficking. Based on Worker interviews and document review, there are no instances of illegal wage deduction, Debt Bondage, or any other form of Forced Labour at the Entity. The Entity's Modern Slavery Statement is available at: http://www.lizhong.com.cn/uploads/tiny/mce/images/e866726647ede29535fc470729d990672ef20485226.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established Policies and procedures for the 'Management Regulations on Prohibition of Discrimination', 'Special Protection of Women Workers' and the Employee Handbook covering Discrimination in line with ILO Conventions C100 and C111. The Entity is committed to non-Discrimination. The Entity promotes a culture of anti-Discrimination through training, publicity, internal communication, etc. There are no identified cases or complaints regarding Discrimination.
10.5 Communication and engagement	Minor Non-Conformance	The Entity has established internal and external communication management Policies and feedback channels. According to interviews with Workers, the Workers can communicate directly and frequently

CRITERION	RATING	COMMENT
		<p>with management to resolve issues related to working conditions and workplace and compensation issues without threats of retaliation, intimidation, Violence, or Harassment.</p> <p>However, since January 2024, the Entity has not recorded and provided meeting minutes regarding the communications with Workers' representatives.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity respects its employees, and disciplinary measures comply with legal requirements. The Entity's Human Rights Policy has been implemented to prohibit Violence and inhumane treatment of employees. The Entity's ASI Management Manual stipulates that the Policy should be reviewed every five years.</p> <p>Training on the 'Violence and Harassment Management Regulation' is provided to employees, which is available at: http://www.lizhong.com.cn/uploads/tinymce/images/5db499916c57e3fdbcl73d2cfa495700672ef1417a6e1.pdf</p> <p>Worker interviews confirmed that there are no incidents or complaints regarding Violence and Harassment.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has a clear wage structure, with some employees receiving a basic wage equal to the statutory minimum wage. The total wage meets the basic needs of Workers, and all Workers are covered by the mandatory social insurance scheme.</p> <p>Overtime wages are paid according to Labour Law. Overtime on weekdays is paid at 1.5 times the basic wage, weekends at 2 times, and statutory holidays are at 3 times.</p> <p>The Entity has established a payroll control procedure, the monthly payment of wages in legal tender and documented. This is reviewed by employees from different departments, and a sample of bank transfer records was reviewed during the Audit.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The working hours and Overtime management regulations have clearly defined the working hours requirements for employees. The Entity implements a three shift, two operations work system. The average working hours in six months are 8 hours.</p> <p>However, as confirmed during employee interviews and a review of employee attendance records, some employees did not receive one day off every seven-day period.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity provides a pre-employment training programme for new employees, covering the Group and corporate culture, the Management System and the Code of Conduct. The Entity informs employees of their right to Freedom of Association and Collective Bargaining through training, e-mail, posters and regular meetings.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an ISO 45001 certified Occupational Health and Safety (OH&S) Management System. The latest surveillance audit was conducted in December 2023, and all safety aspects complied with the standard.</p>

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The ISO 45001:2018 certified OH&S Management System is review by a certification body every three years. The Entity disclosed comparative analyses of performance with peer Businesses, including leading and lagging practices in the 2023 ESG Report, pages 88-89: http://www.lizhong.com.cn/uploads/tinymce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has provided Workers with a mechanism to raise, discuss and participate in the resolution of OH&S issues with management. There is a Safety Committee with representatives from management and frontline personnel. Employee representatives participate in the handling of safety accidents and frontline employees participate in hazard identification, evaluation, and control measures development.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 March 2025	Initial Certification Audit – Full Certification