

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# YUNNAN SUNHO ALUMINUM CO., LTD

CERTIFICATE  
NUMBER

264

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

SGS-CSTC  
STANDARDS  
TECHNICAL  
SERVICES

DATE OF ISSUE

2 MARCH 2023

DATE OF EXPIRY

1 MARCH 2026

CERTIFIED SINCE

2 MARCH 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Ho'.

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

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

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

CERTIFICATION SCOPE

Yunnan Sunho Aluminum Co., Ltd. located in  
Wenshan City, Yunnan Province (China) with main  
production of green low-carbon hydropower  
aluminium.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	YUNNAN SUNHO ALUMINUM CO., LTD
CERTIFICATION SCOPE	Yunnan Sunho Aluminum Co., Ltd. located in Wenshan City, Yunnan Province (China) with main production of green low-carbon hydropower aluminium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (24 – 27 October 2022)</li><li>Surveillance Audit (6 – 7 November 2023)</li><li>Surveillance Audit (17 – 18 February 2025)</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>24 – 27 October 2022 (Initial Certification Audit)</li><li>6 – 7 November 2023 (Surveillance Audit)</li><li>17 – 18 February 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>6 December 2022 (Initial Certification Audit)</li><li>23 November 2023 (Surveillance Audit)</li><li>28 February 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 27 October 2022)</u></p> <p>The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. facility located in Wenshan City, Yunnan Province (China) with the main production of green low-carbon hydropower aluminium.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

---

Surveillance Audit (6 – 7 November 2023)

The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. facility located in Wenshan City, Yunnan Province (China) with the main production of green low-carbon hydropower aluminium.

The supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (17 – 18 February 2025)

The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. facility located in Wenshan City, Yunnan Province (China) with the main production of green low-carbon hydropower aluminium.

The supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

---

AUDIT  
OUTCOME

Certification

---

AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by The Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of The Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

---

CERTIFICATION  
PERIOD

2 March 2023 – 1 March 2026

---

NEXT AUDIT  
TYPE

Re-Certification Audit

---

NEXT AUDIT  
DUE DATE

1 March 2026

---

CERTIFICATE  
NUMBER

264

---

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented procedures to meet the legal compliance requirements. The Entity has conducted annual compliance evaluations.
1.2 Anti-Corruption	Conformance	The Entity has established a management procedure for anti-Corruption. The Entity requires suppliers, contractors and service providers to sign an 'Integrity Commitment Letter'.
1.3 Code of Conduct	Conformance	The Entity has established and implemented a Code of Conduct, which includes the principles relevant to environmental, social and governance performance. The Code is disclosed at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/c31399a9-b829-42f7-8cbf-01b98ed07f6e.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/c31399a9-b829-42f7-8cbf-01b98ed07f6e.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an Environmental, Social and Governance Policy, which includes social, environmental and governance aspects. The Policy was updated by the General Manager in December 2024 and is disclosed in the Sustainability Report, page 12: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/b03354e1-aa21-439a-b25b-eb9fa4315b3f.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/b03354e1-aa21-439a-b25b-eb9fa4315b3f.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has established an Environmental, Social and Governance Policy. The Policy was updated by General Manager in December 2024.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has established an Environmental, Social and Governance Policy and communicated the Policy internally via bulletin boards and training with related employees and is made available to Stakeholders in the Sustainability Report, page 12: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/b03354e1-aa21-439a-b25b-eb9fa4315b3f.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/b03354e1-aa21-439a-b25b-eb9fa4315b3f.pdf</a>
2.2 Leadership	Conformance	The Entity has appointed the Deputy General Manager as the Management Representative of the ASI Management System series.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an integrated Management System (quality, environmental, Occupational Health and Safety (OH&S), and energy) that includes relevant procedures. The Entity's

CRITERION	RATING	COMMENT
		Environmental Management System is certified against ISO 14001:2015, valid until December 2027.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented an integrated Management System that includes relevant procedures and documents to manage the social aspects. The Entity's Occupational Health and Safety Management System is certified against ISO 45001:2018.
2.4 Responsible Sourcing	Conformance	The Entity has established a management procedure for responsible sourcing and communicated the relevant requirements to suppliers and other relevant parties. Document review during the Audit confirmed that in January 2025, the Entity communicated the responsible procurement requirements with the Aluminium Products Marketing Department and Bulk Raw Materials Department of Henan Shenhua International Trade Co., Ltd. The Responsible Sourcing Policy is disclosed at: <a href="http://www.shenhua.com/profile/upload/2025/02/24/6217c426-a4e6-43f8-982b-467e6c6aa90e.pdf">http://www.shenhua.com/profile/upload/2025/02/24/6217c426-a4e6-43f8-982b-467e6c6aa90e.pdf</a>
2.5 Impact Assessments	Conformance	The Entity has conducted Impact Assessments according to legal requirements, including environmental aspects, and social related aspects with health and safety. Governance aspects were considered by the Entity's headquarters. The Entity has no New Projects and no Major Changes to the existing Facility in the past year.
2.6 Emergency Response Plan	Conformance	The Entity has implemented a procedure to manage emergencies and has developed an emergency response plan. Emergency drills are conducted according to legal requirements and internal procedures.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions that addresses the requirement for undertaking due diligence. To date, there have been no mergers or acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity had established a procedure to define the process of closure, decommissioning and divestment. To date, there has been no closure, decommissioning or divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has prepared and disclosed its Sustainability Report, with the latest available version as the 2023 Sustainability Report, accessible at:

CRITERION	RATING	COMMENT
		<a href="http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has established a management procedure to manage the disclosure of information on non-compliance and liabilities. The Entity did not receive any fines, judgments, penalties or non-monetary sanctions in 2023.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has established an 'Integrity Management Procedure' and 'Business Execution and Gift Policy Management Procedure', which stipulate all business activities or external contact activities of the company, including (but not limited to) contact with government departments. The procedures define that employees shall not bribe government officials or government personnel for business needs.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented a procedure for an accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanism. Stakeholders can make complaints, grievances and requests for information via the Yunnan Sunho Aluminum's official WeChat account, or the notice board at the factory gate. No negative cases were found.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product (Aluminium ingot). A Life Cycle Assessment (LCA) verification against ISO 14044:2006 has been undertaken by a third party.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has undertaken a cradle-to-gate LCA of Aluminium ingot, verified by a third party to meet the requirements of ISO 14044:2006. The verification was conducted in April 2022.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The verification statement of the Entity's LCA, which includes the scope of the assessment, is available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/61946a16-84a5-4475-b428-8c8738185878.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/61946a16-84a5-4475-b428-8c8738185878.pdf</a> However, the LCA report on Aluminium ingots for remelting provided by the Entity is incomplete, lacks basic assumptions, and the conclusions are not described appropriately.

CRITERION	RATING	COMMENT
4.2 Product design	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established the 'Aluminium Scrap Processing Management Procedure' to manage Aluminium Scrap. The Entity targets 100% of scrap for recycling and re-use. Any Aluminium Process Scrap that cannot be processed, is transferred to a qualified vendor for disposal according to legal requirements.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's process and product types do not require Aluminium Process Scrap to be separated for recycling or re-use to occur.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity as, based on the Entity's processes and technology, there is no collection and recycling of Products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity as, based on the Entity's processes and technology, there is no collection and recycling of Products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity's GHG emissions have been evaluated by a Third Party. However, the GHG inventory report is incomplete, and the quality of the report requires improvement. The 2023 Greenhouse Gas Verification Statement is available in the Sustainability Report, page 43: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/6d37edc1-f408-40ca-9700-0dc3357338b2.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/6d37edc1-f408-40ca-9700-0dc3357338b2.pdf</a>
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has established an implementation plan for energy conservation and GHG emissions reduction, which addresses internal technical transformations and proposes the next steps to meet energy consumption requirements. However, the plan does not specify the GHG emissions reduction target or analyse the GHG emissions reduction effect brought about by the energy consumption control. The GHG Emissions Targets and Implementation Plan is disclosed at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/e69d2a06-c112-4e77-a6a1-3c776adcae38.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/e69d2a06-c112-4e77-a6a1-3c776adcae38.pdf</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has implemented a GHG management procedure that defines the management team and the duties of the relevant departments. The Entity has

CRITERION	RATING	COMMENT
		an integrated Management System certified to ISO 14001 and ISO 50001.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity's GHG emissions per tonne of Aluminium are calculated as 3.13 tonnes of carbon dioxide equivalent (CO <sub>2</sub> eq).
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the Entity commenced production in February 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented an Environmental Management System certified to ISO 14001 to manage Emissions to Air. Waste air generated during production is collected and treated prior to discharge. Emissions meet the local discharge limit. Further information is included in the Sustainability Report, available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf</a>
6.2 Discharges to Water	Conformance	The Entity has implemented an Environmental Management System certified to ISO 14001 to manage Discharges to Water. Discharges meet both the legal and internal procedure requirements. The latest monitoring report shows that it is qualified. Further information is included in the Sustainability Report and the water balance chart, available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has implemented an Environmental Management System certified to ISO 14001 to manage Spills and Leakages. The Entity has implemented an emergency response plan for environmental events according to the legal requirement and Spills and Leakages risks have been identified and evaluated in the plan. Emergency drills are conducted in accordance with the plan.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established and implemented an emergency response plan to manage Spills and Leakages and externally communicate. The Environment, Health and Safety (EHS) team is responsible for monitoring and the emergency response.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established and implemented an emergency response plan for environmental events that defines the requirement for reporting to interested parties including the Local Community,



CRITERION	RATING	COMMENT
		neighbours and local government in the event of a Spill or Leakage. The Entity's monthly environmental inspection includes inspections of seepage and leakage points. The most recent inspection in January 2025 included high-risk areas such as hazardous waste temporary storage, rainwater collection pools, and project supporting slag yards. No Spills have occurred since the Entity commenced production.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has defined the process for reporting Spills and Leverages. Any Spills are publicly disclosed on the following website: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf</a> No Spills have occurred to date.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established an Environmental Management System according to ISO 14001 and implemented appropriate waste management procedures and a corresponding waste management strategy. The Entity has developed a hazardous waste management plan for 2025, which showed an expected reduction of 500 tonnes of carbon residue.
6.5b Waste management and reporting (disclosure)	Conformance	The annual quantities of Hazardous and Non-Hazardous Waste generated and their disposal methods are reported by the Entity in the Sustainability Report: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to The Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Minor Non-Conformance	The Entity has implemented a waste management procedure as part of the Environmental Management

CRITERION	RATING	COMMENT
		System that addresses the storage and management of Spent Pot Lining (SPL). There is however, no clear estimate of the reduction in SPL by 2025.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has implemented an Environmental Management System and related procedures and instructions to address the process to optimise the recovery and recycling of carbon and refractory materials from SPL.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity's overhaul slag is transferred to Henan Nanyang New Energy New Materials Co., Ltd. for treatment. It is not landfilled but used to make refractory materials after further processing. The Entity has maintained records on the disposal of SPL in the local Hazardous Waste management system, which meets the legal requirement.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has implemented an ISO 14001 certified Environment Management System which includes a waste management procedure. According to Chinese waste regulations, SPL is strictly required to be disposed of as Hazardous Waste and approved by the local government. The Entity has implemented a process to collect information on any regulatory changes in SPL disposal methods and consider alternative options to landfilling.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity has maintained records on the disposal of SPL in the local Hazardous Waste management system, which meets the legal requirement. The Entity does not discharge SPL to marine and aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity recovers Aluminium from the Dross pressing and recycles it in the melting furnaces. The remaining part is sold to external processors for further extraction of the remaining Aluminium. Dross is not landfilled. Aluminium residue is 100% recycled. After the Aluminium ash is produced, it is added to the electrolytic cell with the covering material, and larger particles of the Aluminium ash are used for remelting in the foundry.
6.8b Dross (recycling)	Conformance	The Entity recovers Aluminium from the Dross pressing and recycles it in the melting furnaces. The remaining part is sold to external processors for further extraction of the remaining Aluminium. Dross is not landfilled. Aluminium residue is 100% recycled. After the Aluminium ash is produced, it is added to

CRITERION	RATING	COMMENT
		the electrolytic cell with the covering material, and larger particles of the Aluminium ash are used for remelting in the foundry.
6.8c Dross (review of alternatives)	Conformance	The Entity recovers Aluminium from the Dross pressing and recycles this in the melting furnaces. The remaining part is sold to external processors for further extraction of the remaining Aluminium. Dross is not landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has implemented a water management procedure and undertaken a water assessment. The water balance mapping is available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf</a>
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented a water management procedure and undertaken a water assessment. The water balance mapping is available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/f82b3718-5071-474e-b664-777570f792ba.pdf</a>
7.2a Water management (management plans)	Conformance	The risk assessment determined the water-related risks are low. However, the Entity has developed water management plans.
7.2b Water management (monitoring)	Conformance	The risk assessment determined the water-related risks are low. However, the Entity has developed water management plans which are regularly reviewed by the EHS team.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage and Material water-related risks, available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/9a5385b3-e247-4a6d-ba0a-c01275d26763.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/9a5385b3-e247-4a6d-ba0a-c01275d26763.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has established procedures for the protection of Biodiversity and a Biodiversity Risk Assessment Report has been prepared. The Entity is located within an industrial park developed by the local government and there are no protected flora or wildlife in the Area of Influence. The assessment found there are no significant risks of impact on Biodiversity. The Biodiversity Risk Assessment Report is available at: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/6020124a-bb17-4890-b25e-1c4dd7d1d44d.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/6020124a-bb17-4890-b25e-1c4dd7d1d44d.pdf</a>

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment and the Environmental Impact Assessment found there is no significant risk of impact on Biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment and the Environmental Impact Assessment found there is no significant risk of impact on Biodiversity.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment and the Environmental Impact Assessment found there is no significant risk of impact on Biodiversity.
8.3 Alien Species	Conformance	The Entity has established a procedure for the assessment of risk of Alien Species. A risk assessment has been undertaken and the Entity has implemented appropriate preventive measures.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to The Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to The Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to The Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to The Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights protection control procedure and implemented a Policy commitment to respect Human Rights. The Entity had disclosed the ASI Policy. Further information on Human Rights Due Diligence is available in the Sustainability Report: <a href="http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf">http://www.shenhuo.com/profile/upload/2025/02/24/1734c9fe-b6c5-41c2-9ca6-d291172831c6.pdf</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights protection control procedure and implemented a Human Rights Due Diligence process, which included a supplier performance assessment.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Human Rights Due Diligence determined that no adverse Human Rights impacts have been reported

CRITERION	RATING	COMMENT
		since the Entity's establishment and therefore remediation was not required.
9.2 Women's Rights	Conformance	The Entity has established a female workers protection procedure which reflects all applicable legal requirements. Based on the site audit it was found that women's rights are well respected.
9.3 Indigenous Peoples	Conformance	The Entity has established a procedure for the protection of the rights of Indigenous Peoples. However, there are no Indigenous Peoples within the industrial park where the Entity is located.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has established the protection procedure to ensure respect for the rights and interests of Indigenous Peoples.
9.5 Cultural and sacred heritage	Conformance	The Entity has established a procedure for the protection of cultural and sacred heritage, which addresses the requirement that the Entity communicate with affected communities should any activities impact cultural or sacred heritage sites and values. The Entity is located within the Green Hydropower Aluminium Demonstration Park, and there are no cultural or sacred heritage sites or values within the area.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity had established a project management procedure to address environmental, social and governance issues. The Entity is located within an industrial park which was developed by and is managed by the local government and, as such, resettlements were not required by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as no resettlements were required.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of Local Communities. The nearest community is approximately 10km from the Entity. No complaints from Local Communities have been received.
9.7b Local Communities (impacts)	Conformance	The Entity respects the rights and interests of Local Communities. The Entity has visited the Local Community from the Banlun Township to identify any adverse impacts. No complaints from Local Communities have been received.
9.7c Local Communities (livelihoods)	Conformance	The Entity respects the rights and interests of Local Communities. The Entity has visited the Local

CRITERION	RATING	COMMENT
		Community from the Banlun Township to identify any adverse impacts. The Entity employs Workers from the Local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located within a Conflict-Affected and High-Risk Area. The Entity has implemented a procedure that prohibits the use of minerals from conflict areas and has assessed its supply chain in accordance with its responsible procurement guidelines. The Entity has completed the ASI Due Diligence Annual Plan for Suppliers/Contractors/Service Providers (2024) and provided the ASI Due Diligence Form for review.
9.9 Security practice	Conformance	The Entity has established the 'Management Procedure for Security Responsibilities' which addresses the requirements for compliance to Human Rights. There have been no violations of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China. However, the Entity has established the 'Administrative Procedure for Organizing the Free and Collective Bargaining Rights of Trade Unions' which defines that the Entity shall respect the employees' rights to associate freely.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China. The Entity had established the 'Administrative Procedure for Organizing the Free and Collective Bargaining Rights of Trade Union'. Trade Union activities include a Workers' Congress which is held annually and meet the legal requirement of collective contract regulations.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has established the Trade Union Management Manual, which defined Freedom of Association and Right to Collective Bargaining. It was found the Trade Union and local CCP (Chinese Communist Party) branch was established according to Chinese law requirement (Chinese Trade Union Law). Workers' representatives can deal with the Workers' concerns with management on behalf of Workers. There is a general election every three years.
10.2a Child Labour (minimum age)	Conformance	The Entity has established the 'Management Procedure for Policies and Remedies against Child

CRITERION	RATING	COMMENT
		Labour' which defines the minimum Worker age of 16 years. There is no Child Labour at the Entity.
10.2b Child Labour (hazardous)	Conformance	Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions There is no Child Labour or young Workers at the Entity.
10.2c Child Labour (worst forms)	Conformance	There are no Workers under 18 years old at the Entity.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established the 'Management Procedure for the Prohibition of Human Trafficking' and the 'Management Procedure for the Prohibition of the Use of Forced Labour' which commits the Entity to comply with the prohibition of Forced Labour, slavery and Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established management procedures to ensure it neither engages in nor supports the use of Forced Labour. No form of deposit, Recruitment Fee or equipment advance from Workers are required.
10.3c Forced Labour (migrant workers)	Conformance	Currently, there are no foreign Migrant Workers at the Entity, all Workers are Chinese. No form of deposits or security payments are required from Workers.
10.3d Forced Labour (debt bondage)	Conformance	Based on Worker interviews and profile checks, employment meets the legal requirement, and the Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain the Workers' original documents, only copies are kept in Workers' profiles.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers can terminate their employment with a specific notice period in advance without any penalty. The time for announcement of termination of the employment is in compliance with the Labour Contract Law.
10.4 Non-Discrimination	Conformance	The Entity has established management procedures and is committed to non-discrimination and ensuring equal opportunity. No case of Discrimination has been received.



CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication with all Workers and the Worker representatives, including Worker representative meetings and an internal complaints box.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures comply with legal requirements and require the confirmation of the Worker involved.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined according to the local legal requirement, and the basic wage exceeds the legal minimum wage. The total payment meets the Workers' basic needs and all Workers are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and paid to Workers by bank transfer on the 25th of every month.
10.8 Working Time	Conformance	Daily employee Working Time records are signed by Workers and working hours are monitored and in compliance with Chinese labour law.

#### PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Occupational Health and Safety (OH&S) Policy is implemented, reviewed periodically and communicated with Stakeholders. Workers are trained on the OH&S Policy upon commencing employment.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has established and implemented an OH&S Policy. The Policy is applied to all Workers and Visitors present in any area or activities under the Entity's control. Visitors sign the agreement upon entering the site.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy includes a commitment to comply with legal and other requirements and the Entity collects and evaluates compliance with Health and Safety laws.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are trained on the OH&S Policy upon commencing employment and sign an OH&S risk notification record to confirm their understanding. Workers know their rights to understand the hazards and safe practices for their work and have the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established an OH&S Management System, certified to ISO 45001:2018. The Entity maintains all necessary OH&S Management System procedures.



CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has established an OH&S Management System that addresses consultation with and participation of Workers on OH&S issues, including monthly safety activities and training activities. Workers can discuss and participate in the resolution of OH&S issues with management.
11.4 OH&S performance	Conformance	The Entity has established Health and Safety targets and improvements according to the OH&S Management System. The Entity has reviewed its OH&S performance using established indicators.

#### **Document Control and Version History**

Revision	Date	Notes
0	2 March 2023	Initial Certification Audit - Full Certification.
1	6 April 2023	Text amendment – Revised to update hyperlinks.
2	13 December 2023	Surveillance Audit
3	19 August 2024	Individual ASI Membership for YUNNAN SUNHO ALUMINUM CO., LTD was superseded and the Entity has been included under the HENAN SUNHO COAL & POWER CO., LTD membership
4	28 March 2025	Surveillance Audit