

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Fujian Nanping Aluminum Co., LTD.

CERTIFICATE NUMBER
319

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
18 OCTOBER 2023

DATE OF EXPIRY
17 OCTOBER 2026

CERTIFIED SINCE
18 OCTOBER 2023

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'A' followed by a horizontal line.

Aluminium Stewardship Initiative Ltd
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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

1. Foundry Branch of Fujian Nanping Aluminium Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy round ingots.
2. Extrusion Division of Fujian Nanping Aluminium Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy profiles for construction.
3. Production Department of Fujian Nanping Aluminium Co., LTD., located at No.65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of industrial Aluminium alloy profiles.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Fujian Nanping Aluminum Co., LTD
ENTITY NAME	Fujian Nanping Aluminum Co., LTD.
CERTIFICATION SCOPE	<p>1. Foundry Branch of Fujian Nanping Aluminum Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy round ingots.</p> <p>2. Extrusion Division of Fujian Nanping Aluminum Co., LTD., located at No. 65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of Aluminium alloy profiles for construction.</p> <p>3. Extrusion Division of Fujian Nanping Aluminum Co., LTD., located at No.65 Gongye Road, Yanping District, Nanping City, Fujian Province, China for the production of industrial Aluminium alloy profiles.</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (12 – 14 June 2023)Surveillance Audit (3 – 4 March 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">12 – 14 June 2023 (Initial Certification Audit)3 – 4 March 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 August 2023 (Initial Certification Audit)2 April 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 14 June 2023)</u></p> <p>The Audit Scope covers the activities at Fujian Nanping Aluminium Co., LTD. for the production of alloy round ingot, Aluminium alloy profiles for construction and industrial Aluminium alloy profiles at the Foundry Branch and both Extrusion Divisions.</p> <p>Supply Chain Activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (3 – 4 March 2025)

The Audit Scope covers the activities at Fujian Nanping Aluminium Co., LTD. for the production of alloy round ingot, Aluminium alloy profiles for construction and industrial Aluminium alloy profiles at the Foundry Branch and both Extrusion Divisions.

Supply Chain Activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

Criteria that were identified as non-conformities from the previous Audit 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

18 October 2023 – 17 October 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

17 October 2026

CERTIFICATE NUMBER

319



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

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

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

ENTITY OVERVIEW

Fujian Nanping Aluminium Co., Ltd. (the 'Entity'), formerly known as Fujian Nanping Aluminium Factory, was established in 1958 and is a large State-owned company located near Jianxi and Min Juan rivers in Nanping in the northwest of Fujian Province, China. The Entity, combined with its subsidiary companies, is one of the top ten national Aluminium production companies in China, with a registered capital of over 1 billion yuan, 5,200 employees, and an annual sales revenue of more than 6 billion yuan. This broader Aluminium industry chain includes the production of various Aluminium products, from pre-baked anode Aluminium to electrolytic Aluminium casting, casting-rolling, Aluminium processing, moulds, Aluminium strips, and Aluminium deep processing.

The Entity produces Aluminium alloy round ingots and profiles for the construction industry and industrial applications for the electronics, machinery and transport sectors. It has more than 100 advanced production lines with intelligent manufacturing and management including processes for Aluminium extrusion, surface treatment, Aluminium processing and deep processing. The annual capacity for Aluminium casting and processing exceeds 200,000 tonnes, covering categories such as round ingots, architectural profiles, and industrial profiles. The Entity's products are distributed both domestically and internationally.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	Medium	Medium	MEDIUM
RISKS	Medium	High	Medium	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes to comply with legal requirements. The Entity's Legal Compliance department is responsible for the implementation of Applicable Laws, regulations and other requirements within the organisation and conducts annual Compliance reviews. There are no significant compliance issues within the Entity. Information regarding Compliance performance is disclosed in the Annual Sustainability Report:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c38cbldc3.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented a Policy and procedures to manage anti-Corruption. The Entity has developed and implemented 'whistleblowing' mechanisms (e.g., a suggestion box, hotline: 0599-8733638/400-918-6688, mailbox: jijianjianchashi@mlfjnp.com).</p> <p>The whistleblowing channel is published to the employees and interested parties. The relevant anti-Corruption training courses are provided to employees in high-risk positions. The anti-Corruption Policy is communicated to all suppliers who are required to sign the commitment letters.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established and implemented a Code of Conduct which includes principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the Code among employees, business partners and suppliers. The Code of Conduct is reviewed in the annual management review meeting or whenever there is a major change or control gap. The Code of Conduct is publicly disclosed at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c649ec80e89.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented management Policies that are consistent with ESG practices. The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies are reviewed at the annual management review meeting and whenever there is a major change or control gap. The Entity's Policies are available for internal and external Stakeholders at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c649ff20523.pdf</p>
2.2a-c Leadership	Conformance	<p>The Entity has nominated a senior Management Representative to have overall responsibility and authority for ensuring conformance with the ASI Performance Standard including leading the communication of the ASI-related requirements, Policies by training and on-site posting.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The latest external audit was conducted in October 2024 where no non-conformances were raised.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. The main social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that cover responsible sourcing. The Entity conducts second-party Due Diligence audits of major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. The Responsible Purchasing Policy is reviewed in the annual management review meeting and whenever there is a major change or control gap. The Responsible Purchasing Policy is included in the ASI Social/Environmental/Safety Management Policy, available at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c649ff20523.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has a current extension project to add an Aluminium alloy material production line to increase production capacity. The Entity has assessed the environmental and social impacts relating to applicable legal requirements and implemented an Environmental and Social Impact Management Plan to prevent and mitigate any Material impacts identified. There is a mechanism to review the Plan periodically or as necessary. The Environmental and Social Impact Assessments and the latest active version of the Environmental and Social Impact Management Plans are publicly disclosed at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c12051809e4.pdf
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has a current extension project to add an Aluminium alloy material production line to increase production capacity. The Entity has identified and assessed the risks to Human Rights and established the relevant control measures based on the ASI Performance Standard and associated legal requirements. The result of the Human Rights Impact Assessment indicated that, due to the scale and nature of the extension project and the Entity's location within an industrial zone, the risk and impact on Human Rights is limited. The assessment report on risks to Human Rights is reviewed in the annual management review meeting. The Human Rights Impact Assessment Report and the latest active version of the Management Plan are publicly disclosed at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67db61ea40907.pdf and http://mlfjnp.com/ueditor/php/upload/file/responsibility/67db624e98725.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established a comprehensive Emergency Response Plan and Special Emergency Plan. These two plans are registered with the relevant government agencies. The Entity provides relevant training courses to employees and conducts drill exercises. Both

CRITERION	RATING	COMMENT
		<p>Emergency Response Plans are regularly reviewed every three years or when there is a major change or control gap and are then re-summitted to the authorities for registration. The Emergency Response Plans are disclosed at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c1203389c35.pdf</p> <p>and</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c15bc482ada.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a procedure known as 'Provisions on Decision-Making and Administration of Critical Business Matters' to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Entity commits to obey Applicable Law and company Policies on redundancies and consult employee organisations at the same time. The suspension process and management procedure will be reviewed in case of any Material environmental, social and governance risk(s) caused by Business changes or any indication of control gap and shall be reviewed annually. No suspension activity has occurred within the last three years.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established the Investment and Construction Projects Management Procedure, which addresses mergers and acquisitions, and senior management is responsible for conducting Due Diligence processes for mergers and acquisitions. The procedure ensures that if mergers and acquisitions occur in future, environmental, social and governance practices related to ASI Performance Standard, including those associated with Historic Aluminium Operations, are reviewed. The Entity is a State-owned group enterprise, and no such activity has occurred within the last three years.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a management procedure for closure, decommissioning and divestment (i.e. provisions on decision-making and administration of critical business matters). Senior management will review environmental, social and governance practices related to this Standard in the planning process for closure, decommissioning and divestment if and as they occur, and develop a plan for monitoring any Material environmental, social and governance impacts.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts in its Sustainability Report for 2023, available at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c38cbldc3.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>There were no monetary fines, judgments, penalties or non-monetary sanctions for non-compliances received in 2023. This was verified via management interviews and the official websites of relevant government agencies and Non-Government Organisations (NGOs). This information is disclosed in the 2023 Annual Sustainability Report, page 16:</p>

CRITERION	RATING	COMMENT
		http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c38cbldc3.pdf
3.3a-c Payments to Governments	Conformance	As per the Entity's Internal Control Procedure, payments to Governments are only made on a legal basis. In China, no payments are made to political parties. Payments to Governments include taxes only.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity's Complaint Resolution Policy encourages whistleblowing whenever misconduct is alleged or identified, and the privacy of the whistleblower is guaranteed. The hotline and email address for whistleblowing for internal and external Stakeholders is available in the Emergency Preparedness and Response Plan at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67db624e98725.pdf</p> <p>The Complaints Resolution Mechanism is disclosed at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67ea469ccc489.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>An Environmental Life Cycle Assessment (LCA) has been conducted and documented, and the Product LCA Report for Aluminium alloy building profiles (i.e. powder coating) is available at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c1201857a10.pdf</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c606bcd75.pdf</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has assessed the 'cradle-to-gate' life cycle impact of their main Products. The Entity has prepared an LCA Report according to the principles in ISO 14040, ISO 14044, and PCR: QCQM EPD130205:2021 Standard. The condensed report discloses key information about the LCA, such as underlying assumptions and system boundaries. A summary of the Report is available at:</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c606bcd75.pdf</p> <p>http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c1201857a10.pdf</p> <p>The Entity confirms that subject to the terms of the relevant contract with customers, adequate 'cradle-to-gate' LCA information on Aluminium products will be made available to the customer upon request. Audit interviews and document review confirmed no requests have been received to date.</p>
4.2 Product Design	Conformance	The Entity has integrated relevant objectives in the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the final Product.
4.3a-b Aluminium Process Scrap	Conformance	The target for the collection, recycling and/or re-use of Aluminium Process Scrap is defined as 100%. Management procedures of 'Aluminium Process Scrap Management Regulation' and 'Recycled Material Category and Re-using Guide' are developed to ensure the target is achieved. The Entity categorises and recycles Aluminium

CRITERION	RATING	COMMENT
		<p>Scrap generated from the production process, as well as the Aluminium Scrap provided by external suppliers, based on the alloy series for recycling and utilisation.</p> <p>The Entity has adopted technical and management measures to reduce the generation of Aluminium Process Scrap within its operations. They are collected, recycled and/or re-used, and the target of 100% collection, recycling and/or re-used is approached.</p>
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	<p>The Entity has developed a strategy to use Recycled Aluminium with a 2030 target for the consumption of Recycled Aluminium to reach 0.15 million tonnes per annum, equal to between 45% and 55% total of the annual raw material consumption by the Entity. The Entity reviews its use of Recycled Aluminium against the target annually and adjusts the strategy, target and plan following the management review meeting. The recycling strategy is available at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db626dd91e6.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has developed a strategy to use Recycled Aluminium with a 2030 target for the consumption of Recycled Aluminium to reach 0.15 million tonnes per annum. The Entity has implemented a 'Technical Renovation Project for an Annual 80,000-ton Green Low-carbon High-end Aluminum Alloy Material Production Line', with the main Product being low-carbon Recycled Aluminium. The proportion of recycled Aluminium alloy used can be controlled to account for between 50% to 100% of annual material input. Over 6,000 tonnes of Post-Consumer Aluminium Scrap is utilised to produce Aluminium-manganese, Aluminium-copper, and Aluminium-silicon alloy ingots for both internal use and external sales.</p> <p>The newly established projects are specifically designed to collaborate with local enterprises and relevant government departments to enhance post-consumer Aluminium recycling. Through these partnerships, the Entity actively engages with local, regional, or national collection and recycling systems, supporting precise measurement and contributing to the increased recycling rates within their respective markets for Aluminium alloy profiles.</p> <p>Both casting Aluminium alloy ingots and round Aluminium alloy ingots have passed the SCS Recycled Content Certification from the United States, with the Aluminium alloy ingot products containing no less than 30% Post-Consumer Aluminium Scrap.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity is classified by the local authority as a major energy-consumer and Greenhouse Gases (GHG) emissions unit. The Entity has calculated its GHG emissions for 2023, which have been verified by a qualified Third Party before being reported to the authority.</p> <p>However, the calorific value of natural gas was calculated using referenced values rather than measured values and the electricity emission factors did not incorporate the most recent data.</p> <p>The Entity publicly discloses verified information on energy use and GHG emissions by source for 2023, available at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c1lffc90c38.pdf</p>

CRITERION	RATING	COMMENT
		http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db62d1ee894.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established GHG emissions reduction targets using both a Science Based Target (SBTi) tool and the ASI Entity GHG Pathways Calculation Tool regarding their commitment to 'green' and low-carbon development, whilst being consistent with a 1.5°C warming scenario. All sites within the Entity have defined their GHG emission reduction plans and intermediate targets.</p> <p>The Entity has developed a mechanism to review the GHG Emissions Reduction Plans annually and a review of the GHG Emissions Reduction Pathways is also undertaken if required.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity has defined a GHG Emission Reduction Plan that includes Intermediate Targets. The Plan and the GHG Emission Reduction Pathways are available at:</p> <p>http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db62e52d004.pdf</p> <p>There is a mechanism to review the GHG Emissions Reduction Plans annually and a review of the Pathways is also undertaken if required.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a GHG Emission Reduction Plan to define the management approaches to GHG emissions reduction with a focus on energy management. Site observations, document reviews and interviews confirm that the Entity adheres to a 'Plan-Do-Check-Action' approach to manage energy consumption and monitor Management System performance to achieve the outcomes defined in the GHG Emission Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Following both the Environment Management System and legal requirements, the Entity has identified, assessed and quantified Material Emissions to Air from its activities, and implemented control plans to minimise exposure to, and impacts from Emissions to Air.</p> <p>The Entity monitors and reviews the effectiveness of the control plans periodically and when any change or non-conformance is identified. The Entity publicly discloses environment performance information, pollutant discharge information, monitoring results, the operational status of the environment protection facilities and the Air Emission Control Plan, all of which are available at:</p> <p>http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c11fbc5be00.pdf</p>

CRITERION	RATING	COMMENT
		http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db6211a60a4.pdf
6.2a-g Discharges to Water	Conformance	<p>All wastewater is treated in the Entity's sewage treatment station before discharge into the external drainage/water system in accordance with the Entity's Pollutant Discharge Permit. The Entity collects, treats, and recycles all wastewater. The quarterly monitoring results demonstrate that the water quality meets the required recycling water standards. The monitoring results of surrounding soil, surface water and underground water, demonstrated that there were no pollutants identified at any of the Entity's sites.</p> <p>The Discharges to Water information and the target and management program are disclosed at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c11fbc5be00.pdf http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c1276ba2271.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has completed an assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil, which has been incorporated into the Entity's Environmental Management System. The relevant management plan has been established and implemented. The Entity reviews the plans periodically and as needed following a Spill and/or Leakage event or if a major change occurs.</p> <p>The risk assessment report of Spills and Leakages is disclosed at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c15bbci5f29.pdf</p> <p>The latest version of the Emergency Response Plan for environment incidents is disclosed at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c15bc482ada.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The reporting of Spills and Leakages is defined in the Entity's Environment Protection Management Procedure. The Entity's sites are required to report the accident to the local government agency and the affected parties if Spills or Leakages occur, however, none have occurred in the past three years. The latest version of the management plan is available at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c11f600296e.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's Environmental Management System addresses Waste management. The Entity has implemented a Waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates the Material impacts by re-using and recycling waste. The procedure for the disposal of Hazardous Waste adheres to applicable legal requirements. The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Wastes generated from its activities in 2024 at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db6231dda92.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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	Dross generated at the Entity is managed in compliance with the applicable legal requirements, and no Leakages are observed and/or reported. The Entity has a Dross treatment facility to maximise the recovery and recycling of Aluminium by treatment of Dross and Dross residues. The Entity does not landfill Dross residues. The Entity is investing to increase the capacity of the Dross treatment facility to increase their contribution to the Circular Economy and to mitigate the environmental impacts of Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	In the Entity's Environmental Impact Assessment, the Entity has identified and documented water withdrawal and use by source and type. The Entity has assessed water-related risks, considering the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures. The risk level identified is low, and there are no Material or significant water-related risks in the Entity's Area of Influence. The assessment report of Water-Related Risks and Water Inventory Map is available at: http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c1lec2f09e.pdf http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c1led55462c.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Biodiversity and Ecosystem Services risk and impact assessment is included in the Environmental Impact Assessment (EIA), which was conducted by qualified third parties, and approved by the local environment protection agency. The approved EIA reports demonstrate that there are no Biodiversity-sensitive areas located within the Entity's Area of Influence and the overall risk level is low. The Entity is located in an industrial zone planned by the local government and has an effective Environment Management System.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services were identified.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity has identified the risks relating to the introduction of Alien Species for both their operational and logistical activities. The result is the risk is low.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	As outlined in the ASI Performance Standard Management Manual, the Entity is committed to not exploring or developing New Projects or making Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity’s Area of Influence.
8.6a-d Protected Areas	Conformance	As outlined in the ASI Performance Standard Management Manual, the Entity commits to protecting the environment. There are no Protected Areas adjacent to the Entity’s Area of Influence.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Policy with the commitment to respect Human Rights including gender equity, and has communicated the Policy to all Stakeholders through a Stakeholder engagement process. The Entity conducts an annual review of the implementation of this Policy through management review and is committed to revising the Policy in a timely manner should any significant potential changes or control deviations arise.</p> <p>The ASI Social/Environmental/Safety Management Policy is publicly disclosed at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c649ff20523.pdf</p> <p>The Entity has established and implemented a Human Rights Due Diligence process, where Human Rights risks have been identified and assessed, and the major risks identified are within the supply chain. The Entity’s Supplier Code of Conduct is communicated to major suppliers. The associated mitigation and control measures are established and implemented, such as audits for major suppliers. The supplier audit reports confirm that no adverse cases were reported. The Human Rights Due Diligence process is reviewed in the annual management review meeting.</p> <p>The Entity has identified the populations and organisations that may be affected by its operational activities (including neighbouring businesses and employees around its plant locations) through the implementation of its compliance management and risk control procedures. The Entity’s Human Rights Risk Assessment Report indicates that its impact on the Human Rights of populations and organisations within its Area of Influence is minimal. The Entity’s Human Rights Risk Assessment Report is disclosed at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67db61ea40907.pdf</p> <p>The Entity has cultivated relationships and maintains close communication with the Affected Populations and Organisations.</p>

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9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented Policies to respect the rights of women and a program to promote gender equity and women's empowerment throughout the employment process. No complaints have been received from women Workers. The interviewed women Workers stated that they understand their rights and no negative feedback was received. The Entity has assessed the program on gender equity and women's empowerment, the report is disclosed at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c11e9f8155e.pdf
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.</p> <p>However, the Entity has established and implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. The assessment report confirmed that there are no Indigenous Peoples within the Entity's Area of Influence.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.</p> <p>However, the Entity has developed a Stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for New Projects and significant modifications to existing projects. The assessment report confirmed that there are no Indigenous Peoples within the Entity's Area of Influence.</p>
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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify and assess any presence of cultural and sacred heritage sites in or near the Entity's Area of Influence and aims to minimise any potential impact on these sites. Currently, all new and existing projects of the Entity have undergone Environmental Impact Assessments (EIA) and social assessments. Through these assessments, it has been determined that there are no sacred or cultural heritage sites within the Area of Influence of the Entity.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has established a Policy to address the resettlement within the legal framework. In China, any resettlement activities are managed by the Government. There are no projects in the history of the Entity that have caused any resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Policy with a commitment to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity has established and implemented compliance management and risk control procedures to identify, prevent, monitor and mitigate any

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		<p>significant impacts caused by its activities, including those related to health and safety, social and cultural Human Rights and environmental impacts.</p> <p>The Entity works closely with the Industrial Estate Management Committee and, through its Stakeholder engagement process, consults and involves Affected Populations and Organisations in the development of its management plans, including the Safety Contingency Plan and the Environmental Contingency Plan. In addition, the Entity actively participates in and allocates resources to various community public welfare activities organised by the Industrial Zone Management Committee, including public awareness campaigns on road safety, fire prevention and communications-related fraud prevention.</p> <p>The Entity's primary impact on neighbouring populations and organisations arises from the environmental impact of its production activities, particularly air pollutants. To address this, the Entity has developed an environmental control plan in accordance with legal requirements and regularly reports the status of its implementation to the environmental protection agency. The relevant plans and implementation reports are made available to the public and are disclosed at: https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&dataid=4b7d8b88b66641768bdfba7dd65d6fa2</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has implemented a Policy to commit to not using conflict minerals and established and implemented a management system, including supply chain mapping, risk assessment, control plan, Due Diligence audits and reporting. The Entity provides training to all relevant employees. The Policy and requirements are communicated to suppliers, and all suppliers are required to sign a commitment letter to not use conflict minerals.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts supply chain risk assessments to determine if materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs), based on the communication with suppliers. Per the risk assessment report, there are no materials from CAHRAs, all suppliers are in China, and there are no critical Human Rights issues such as Child Labour or Forced Labour.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment report determined there are no materials sourced from CAHRAs and therefore no red flags have been identified in the supply chain. The Entity maintains ongoing business relationships with all material suppliers.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>As part of the supplier Due Diligence process, the Entity identifies its major next-tier suppliers, establishes supplier audit plans, and conducts second-party due diligence audits at major next-tier suppliers' sites. The risk assessment records and supplier audit reports from 2023 and 2024, confirm that no material is sourced from CAHRAs, therefore the risk of conflict minerals is low, and no further actions are needed.</p> <p>Additionally, the Entity's Due Diligence practices and risk assessment were reviewed as part of the ASI Performance Standard Certification Audit, which addresses this requirement.</p>

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9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The details and the result of the Entity's supply chain Due Diligence on CAHRAs for 2023 are publicly disclosed in the annual Sustainability Report, page 10: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c7c38cbldc3.pdf
9.9 Security practice	Conformance	All security guards employed by the Entity are committed to upholding Human Rights in their activities. Strict Policies ensure that no body searches are permitted, and security guards are expected to undertake their duties humanely. Comprehensive training is provided to all security guards to ensure they understand their responsibilities and the importance of respecting Human Rights. No grievances or complaints have been received regarding the conduct of security activities, indicating a positive track record.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the Entity complies with Applicable Law in China related to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's senior management is committed to respecting the right to Freedom of Association and Collective Bargaining. This commitment is demonstrated through various practices and processes. Employees democratically elect Workers' representatives every five years, ensuring their autonomy and representation. Regular Workers representative congress meetings are held annually, providing a platform for open communication and discussion between Workers and senior management. During these meetings, Workers' concerns and issues are addressed and deliberated. Furthermore, a Collective Bargaining Agreement is established between the Entity and Workers' representatives. This agreement is signed and approved by senior management, solidifying their commitment to fair and collaborative labour relations.
10.2a Child Labour	Conformance	The Entity has established a policy prohibiting the use of Child Labour, and the age of candidates is verified during the employment interview and by checking identity (ID) cards. Copies of the ID cards of Workers are kept in the personnel files as evidence of age verification. As per the roster, site observation and interviews with sampled Workers, the youngest Worker at the Entity is 22 years. In China, the minimum working age is 16.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy that strictly prohibits Forced Labour, including Human Trafficking. This Policy applies not only to the Entity but also to its suppliers, emphasising the importance of compliance with the prohibition of Forced Labour, Modern Slavery, and Human Trafficking. There are no instances of illegal wage deduction, Debt Bondage, payment of debt, or any other indicators of Forced Labour that have been identified or reported within the Entity. Detailed information regarding the Policy and its implementation can be found in the Entity's Code of Conduct and Modern Slavery Statement. These documents are available at: Code of Conduct: http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482eb94470e2.pdf

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		Annual Modern Slavery Statement: http://mlfjnp.com/ueditor/php/upload/file/responsibility/6482ea95dfb52.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. The Entity's recruitment advertisements and training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than on other personal characteristics. The Entity provides equal pay for the same role. This was verified through Worker interviews who confirm they are treated equally. No cases of Discrimination have been received.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and Workers' representatives. Communication channels are provided to Workers where they can raise complaints and concerns regarding working conditions and the resolution of any workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures comply with legal requirements and require the confirmation of the involved Worker. The Entity does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, gender-based Violence including sexual Harassment, or verbal abuse of Workers. The Policy on Violence and Harassment is included in the ASI Social/Environmental/Safety Management Policy at: http://mlfjnp.com/ueditor/php/upload/file/responsibility/67c649ff20523.pdf
10.7a-c Remuneration	Conformance	The Entity's wage structure is clearly defined, which includes the basic wage, Overtime wage, allowances, and performance bonuses. The basic wage meets the local legal minimum wage. The total payment covers the basic needs of Workers, and the net wage remaining after the deduction of taxes, and social security is significantly higher than the local minimum wage standard. The Entity documents wage payments and all Workers are paid in a timely manner by bank transfer on the 17 th of the following month. Detailed information on wages, allowances, Overtime work compensation, and deductions are included in the payslip.
10.8a-c Working Time	Conformance	Working hours are recorded both by facial recognition system and manually. There are several shifts in the factory. A management procedure on working hours and Overtime is established to control any Overtime. A sample of Working Time records for March, July and November 2024 reviewed during the Audit found no inconsistencies. Employees are guaranteed at least one day off each week. A review of the period December 2023 to December 2024 confirmed that the total working hours for sampled Workers did not exceed the legal limit of 2,432 hours, with a range of 2,286 to 2,420 hours. The average workday does not exceed eight hours over a six-month period.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides training on Worker's rights during both the orientation training when Workers first join the Entity, and refresher training when there is a change in the legal requirements or the

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		Entity's regulations. The employee handbook has a specific section on Worker's rights and is available to all employees.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented, maintains and continually improves an Occupational Health and Safety (OH&S) Management System. The Entity holds a valid ISO 45001:2018 certificate. Site observations, document reviews and interviews with management and Workers demonstrated that the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity periodically reviews the OH&S Management System through quarterly safety meetings, annual legal compliance evaluation, annual internal audit against ISO 45001:2018, and management review meetings.</p> <p>When any indication of a control gap is shown, a review is conducted to assess if potential corrective and/or preventive actions should be implemented. The achievement of OH&S objectives and targets for 2024 and the comparative analyses of performance with peer Businesses and leading practice are available at:</p> <p>http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67db62825869e.pdf</p> <p>http://www.mlfjnp.com/ueditor/php/upload/file/responsibility/67c11e565bb77.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a system for Workers' consultation and participation in Health and Safety. Workers may take part in raising and discussing OH&S issues in the Entity's Health and Safety Committee meetings which are held quarterly. Workers are encouraged to report their concerns or advice on OH&S issues via their Worker representative. Where required, Entity management responds to the concerns and advice on OH&S issues from Workers.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 October 2023	Initial Certification Audit – Full Certification
1	24 April 2025	Surveillance Audit