# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## Shandong Foundry Metal Technology Co., Ltd

CERTIFICATE NUMBER

420

**ASI STANDARD** 

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

31 MARCH 2025

**CERTIFICATION LEVEL** 

FULL CERTIFICATION

DATE OF EXPIRY

30 MARCH 2028

ASI ACCREDITED AUDITING FIRM

SGS-CSTC STANDARDS TECHNICAL SERVICES

**CERTIFIED SINCE** 

31 MARCH 2025

#### **AUTHORISED BY**

The \_\_

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

#### **CERTIFICATION SCOPE**

The production of magnesium alloy and Aluminium alloy components including processes of Aluminium Re-melting/Refining, cold and hot chamber die-casting, grinding and CNC machining at production facilities No. 6, No. 12 and No. 16, Yuhai Street, Chenggang Subdistrict, Laizhou City, Yantai City, Shandong Province, P.R., China.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

MEMBER NAME	Shandong Foundry Metal Technology Co., Ltd				
ENTITY NAME	Shandong Foundry Metal Technology Co., Ltd				
CERTIFICATION SCOPE	The production of magnesium alloy and Aluminium alloy components including processes of Aluminium Re-melting/Refining, cold and hot chamber die-casting, grinding and CNC machining at production facilities No. 6, No. 12 and No. 16, Yuhai Street, Chenggang Subdistrict, Laizhou City, Yantai City, Shandong Province, P.R., China.				
SUPPLY CHAIN ACTIVITIES	<ul><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>				
ASI STANDARD	Performance Standard V3				
AUDIT TYPE	Initial Certification Audit				
AUDIT FIRM	SGS-CSTC Standards Technical Services				
AUDIT DATE	• 9 – 12 October 2024				
AUDIT REPORT SUBMISSION	• 19 November 2024				
AUDIT SCOPE	The Audit Scope included the production of magnesium alloy and Aluminium alloy components including processes of Aluminium Re-melting/Refining, cold and hot chamber die-casting, grinding and CNC machining at production facilities No. 6, No. 12 and No. 16, Yuhai Street, Chenggang Subdistrict, Laizhou City, Yantai City, Shandong Province, P.R., China.				
	Supply chain activities included in the Audit Scope:				
	Aluminium Re-melting/Refining				
	• Casthouses				
	Semi-Fabrication				
	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.				
AUDIT OUTCOME	Certification				
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:				
	<ul> <li>The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li>The findings are based on verified Objective Evidence relevant to the time period</li> </ul>				
	for the Audit, traceable and unambiguous.				

OLIVII IOATE NOMBER	420		
CERTIFICATE NUMBER	420		
NEXT AUDIT DATE	30 September 2026		
NEXT AUDIT TYPE	Surveillance Audit		
CERTIFICATION PERIOD	31 March 2025 – 30 March 2028		
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.		
	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.		



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

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**

Shandong Foundry Metal Technology Co., Ltd. ('the Entity') operates three production plants in an industrial area of Shandong, China. The Entity is primarily engaged in the production of high-quality and high-strength magnesium alloy and Aluminium alloy products, using precision die-casting and extrusion processes. The Entity operates extrusion casting machines, cold chamber die-casting machines and hot chamber die-casting machines, and has introduced advanced machining centres and various CNC machine tools to process complex castings to meet the needs of different users. The Entity actively works to close loops in its industry chain and has developed recycling and melting processes for production waste and scraps.

The Entity's Products are used in multiple industries such as automotive, electronics, telecommunications, photography equipment, and power tools. The Entity employs approximately 180 Workers and has a current annual production capacity of approximately 1.2 million component sets.

#### **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	Low	Medium	MEDIUM
RISKS	Medium	Low	Medium	MEDIUM
PERFORMANCE	Medium	Low	Medium	MEDIUM
OVERALL		MED	IUM	

### **FINDINGS**

CRITERION	RATING	COMMENT		
1. BUSINESS INTEGRITY	1. BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has assessed the applicability of Laws and regulations to its activities and has assessed its Compliance with relevant Applicable Laws. The Entity has developed and implemented compliance assessment and control procedures as well as legal and regulatory management procedures.		
1.2 Anti-Corruption	Conformance	The Entity has formulated and implemented an 'Integrity Management Procedure' and a 'Business Entertainment and Gift Policy Management Procedure' to combat Corruption, with implementation responsibility assigned to the Human Resources Department. Personnel in senior or other key positions must sign an integrity agreement and anti-Corruption commitment statement. The Entity has published a complaints hotline regarding Corruption. Further information is available in the Entity's ASI Policy which is accessible at: http://www.yatonggroup.com/viewfilebizce/1844661985864900608		
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct related to its Environmental, Social and Governance (ESG) performance. The Entity conducts an annual internal audit and management review to ensure effective implementation of management systems relating to the Code. The Code itself is reviewed every five years. The Code of Conduct is disclosed on the Entity's website at: http://www.yatonggroup.com/viewfilebizce/1857331114955845632		
2. POLICY AND MANAGEMEN	Т			
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented an ASI Management Policy and an Environmental and Occupational Health and Safety Management Manual which collectively address the ESG practices in the ASI Performance Standard. These Policies and procedures are endorsed and supported by the Entity's General Manager. The Entity conducts management reviews annually under the coordination of the General Manager. The last review identified no significant changes in ESG risks and control deficiencies. The ASI Management Policy is communicated internally through documents, training and on-site demonstrations, and externally through promotional materials and company presentations.		
		The ASI Management Policy has been disclosed on the Entity's website at: http://www.yatonggroup.com/viewfilebizce/1844661985864900608		
2.2a-c Leadership	Conformance	The Entity has nominated their Deputy General Manager as the senior Management Representative responsible for implementation of Policies related to the ASI Performance Standard and ESG practices. The Deputy General Manager is in regular communication with relevant employees regarding Policy implementation.		
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented an Integrated Management System regarding environmental performance. The Entity has obtained ISO 14001:2015 certification.		

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System that identifies Stakeholders including community members, assesses impacts on Stakeholders from the Entity's business activities, and develops projects and strategies to address these impacts. The Entity's Management System also focuses on identifying and responding to risks related to Human and Labour Rights.
2.4a-e Responsible Sourcing	Minor Non- Conformance	The Entity has implemented a Responsible Sourcing Policy covering ESG issues in their supply chain. The Policy forms part of the Entity's ASI Management Policy which is disclosed on the Entity's website at: <a href="http://www.yatonggroup.com/viewfilebizce/1844661985864900608">http://www.yatonggroup.com/viewfilebizce/1844661985864900608</a> During the Audit of the Entity's implementation of this Policy however, it was identified the Entity has not assessed their supply chain against sustainable development, low-carbon and environmental protection issues.
2.5a-g Environmental and Social Impact Assessments	Conformance	Each of the facilities operated by the Entity sites have passed the environmental assessment acceptance required under Applicable Law. The Entity has disclosed the performance related to environmental and social impacts and disclosed it on the official website.  Further information on the Entity's environmental assessments and performance is accessible on their website at: http://www.yatonggroup.com/viewfilebizce/1857330857769349120
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has conducted Human Rights Impact Assessments for their current projects, in accordance with their parent company's standards and regulatory requirements. The relevant disclosures are made on the Entity's website at:  http://www.yatonggroup.com/viewfilebizce/1857331611850682368
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Environmental Management System and an Occupational Health and Safety (OH&S) Management System, which include emergency preparedness and response control procedures. Emergency Response Plans (ERPs) have been developed for various environmental, social and safety emergencies. The Entity conducts regular testing activities on emergency procedures to evaluate the suitability of the ERPs. The effectiveness of emergency response plans is evaluated annually. After an emergency occurs or when there are signs of control deficiencies, the Entity will review the implementation of the ERP and adjust and modify the plan as needed.  The Entity's safety Emergency Response Plan is disclosed at: <a href="http://www.yatonggroup.com/viewfilebizce/1844663326528036864">http://www.yatonggroup.com/viewfilebizce/1844663326528036864</a> The Entity's environmental Emergency Response Plan is disclosed at:
2.8a-d Suspended Operations	Conformance	http://www.yatonggroup.com/viewfilebizce/1844663568704118784  The Entity has developed ESG Management Procedures for Enterprise Closure, Decommissioning and Divestment to manage shutdowns and production interruptions. These procedures address relevant ESG impacts, and describes the required management actions throughout any shutdown, closure, decommissioning or divestment processes.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established corporate mergers and acquisitions procedures, which include Due Diligence processes on both buyers

RATING	COMMENT
	and sellers that cover ESG aspects. The Entity has not conducted any mergers nor acquisitions since joining ASI.
Conformance	The Entity has developed a Closure, Decommissioning and Divestment Management Procedure that sets out the required actions of the Entity in these scenarios. If closure, decommissioning and divestment events occur, the Entity will review ESG related impacts, with responsibility assigned to relevant departments. Since the Entity joined ASI, no closure, decommissioning or divestment activities have occurred.
Minor Non- Conformance	The Entity has developed and disclosed a Sustainability Report that describes the Entity's performance against ESG outcomes. The report has been reviewed and approved by the Board of Directors and senior management.  The information disclosed in the report however lacks quantitative results and some substantive issues are not fully disclosed, such as the Greenhouse Gas (GHG) Emissions reduction plan, hazardous waste management, and conflict minerals risk management.  The Entity's 2024 Sustainability Report is disclosed at: <a href="http://www.yatonggroup.com/viewfilebizce/1844202861667958784">http://www.yatonggroup.com/viewfilebizce/1844202861667958784</a>
Conformance	The Entity has developed an Information Disclosure Management Procedure and has established compliance violation and responsibility disclosure requirements in the ASI Management Manual. No non-compliance or penalties occurred during the period from September 2023 to September 2024. Any disclosures will be made in the Entity's Sustainability Report. The 2024 Report is available at: http://www.yatonggroup.com/viewfilebizce/1844202861667958784
Conformance	All payments made by the Entity to the government are subject to applicable laws and tender contracts as required by the Entity's integrity policy. Financial records are kept for each payment and displayed in the Entity's financial statements. Payments are regularly audited by the Group to ensure that the payments and amounts are legal. During the review period, the Entity did not make any financial or political donations.
Conformance	The Entity has established the Employee Complaint (Appeal) Management Procedure and a complaints procedure through their ASI Policy, which includes appropriate Complaint Resolution Mechanisms. The Entity's Human Resources Department is responsible for the review and resolution of complaints or appeals. The Entity reviews the Complaint Resolution Mechanism annually during internal meetings and management reviews. Currently there are no signs of major changes or control vulnerabilities.  The Entity has published the complaint channels and resolution mechanisms on their website, in commitment notes sent to all suppliers, signage on the facilities entry points. The Entity's ASI policy which discloses the complaints mechanism is accessible at: http://www.yatonggroup.com/viewfilebizce/1844661985864900608
	Conformance  Conformance  Conformance

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Minor Non- Conformance	The Entity has provided a product Life Cycle Assessment (LCA) report on the life cycle impacts for specific Aluminium extrusion Products from 'cradle-to-gate'. However, the report is currently only available for a minority of the Products the Entity produces.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has made their Product LCA Reports available on customer request. The Report includes the scope and system boundaries, impact types and assessment methods, life cycle inventory analysis, and life cycle impact assessment.
4.2 Product Design	Conformance	The Entity has clearly defined the relevant requirements for product design in the ASI PS Management Manual and has implemented a Process Design Control Procedure. The Entity has established an LCA procedure for the Product design process to identify customer requirements while considering environmental impacts including energy, consumption, water, air emissions and waste.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a procedure for the recycling of Aluminium Process Scrap. Aluminium Scrap is collected, separated by type for recycling purposes, and returned via the re-melting process. The Entity has set their Aluminium waste ration as an operational Key Performance Indicator (KPI). At the time of the Audit the Entity's Aluminium Process Scrap recycling rates were 100%.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	To increase the recycling rate of their Aluminium containing Products in relevant markets, the Entity has signed a waste collection and recycling contract with a third party. Alloy grades are cast on the surface of the Entity's Products to assist the classification and recycling at End of Life.
5. GREENHOUSE GAS EMISSI	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non- Conformance	The Entity has accounted for and discloses its GHG emissions and energy use. GHG emissions accounting was completed by an external consultant, and the emissions data have been independently verified.
		During the review of the GHG emissions data, errors and omissions were observed. The Entity purchases Aluminium ingots of primary and secondary Aluminium; however, the Entity's report did not separately calculate the GHG emission coefficients of the Primary Aluminium and Recycled Aluminium. In addition, it was found that the Entity did not properly account for emissions from Primary Aluminium.
		The Entity's 2024 report of GHG Emissions and statement of independent verification is accessible at: http://www.yatonggroup.com/viewfilebizce/1887767478995771392
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non- Conformance	The Entity has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway using the ASI endorsed methodology. The Entity has internally assigned responsibility for implementing the Reduction Plan. The Reduction Plan establishes the Entity's short-term, medium-term, and long-term emission reduction targets. The Entity has established 2023 as its baseline year.  However, due to missing data in the Entity's GHG inventory, the emissions reduction targets and the associated abatement actions do not fully reflect the Entity's situation. The Entity's current GHG Emissions Reduction Plan is accessible at: http://www.yatonggroup.com/viewfilebizce/1887765988355497984
5.4 GHG Emissions Management	Minor Non- Conformance	The Entity has implemented a Management System including a Greenhouse Gas Protocol Management Process to ensure that performance as outlined in the GHG Emissions Reduction Plan is met and that the GHG emissions reduction targets are achieved.  However, the Entity's Management System has not performed adequately to ensure the accuracy of its GHG emissions data, and it was determined that there is a lack of knowledge and capability needed to address the GHG emissions requirements of the ASI Performance Standard.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity's Emissions to Air are controlled by pollution control devices and regular monitoring is undertaken to ensure compliance with local statutory emission limits. An air pollutant reduction plan has been developed and is reviewed annually. At the time of the Audit, no emissions to air have exceeded local limits. Air pollutant emission information is disclosed on the Entity's website and in the Entity's Sustainability Report, available at:  http://www.yatonggroup.com/viewfilebizce/1844202861667958784  The Entity's report of Emissions to Air is disclosed at:  http://www.yatonggroup.com/viewfilebizce/1844663489356275712
6.2a-g Discharges to Water	Conformance	The Entity does not discharge process wastewater. The discharge of domestic sewage is carried out in accordance with the Entity's Water Pollution Management System. The Safety and Environmental Protection Department is responsible for the management of water pollution prevention and checks the implementation of the management standards of domestic wastewater in various departments on a quarterly basis. At the time of the Audit there were no discharges to water exceeding local limits.  Further information is disclosed in the Entity's 2023 Pollutant Emissions and 2024 Emissions Reduction Plan, available at: http://www.yatonggroup.com/viewfilebizce/1857330936964255744
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented an ISO 14001 Environmental Management System, which includes a risk assessment describing all significant environmental incidents, including Spills and Leakages. An Emergency

CRITERION	RATING	COMMENT
		Response Plan is in place to respond to emergencies that could impact the environment, specifying how to respond and how to intervene. Processes for managing emergencies, external communications, compliance controls and monitoring plans are in place to prevent and detect Spills and Leakages.
		The Entity's Emergency Response Plan is available at: <a href="http://www.yatonggroup.com/viewfilebizce/1857331738085052416">http://www.yatonggroup.com/viewfilebizce/1857331738085052416</a>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting process for Leakages and Spills is detailed in the Entity's ASI PS Management Manual. Impact assessments of leaks and spills and remedial actions taken are published in the annual Sustainability Report. No major Leakages or Spills have occurred since the Entity commenced operations.  The Entity's Spills and Leakage Risk Assessment Report is available at: http://www.yatonggroup.com/viewfilebizce/1857330790746968064
		The part of the pa
6.5a-c Waste Management and Reporting	Minor Non- Conformance	The Entity's solid waste management program defines Waste management strategies, including how to minimize, reuse, sort and dispose of Waste. Risk assessments are performed on Waste disposal.
		However, issues were observed in the Audit regarding the Entity's storage and handling of Waste. In particular, the Entity was observed to stockpile Aluminium chips outside without classification and zoning management. Water had accumulated in a waste storage area creating a safety risk, and waste hydraulic oils were stored without labelling or leakage prevention measures.
		The Entity reports waste disposal data statistics in their 2024 Sustainability Report which is accessible at: <a href="http://www.yatonggroup.com/viewfilebizce/1844202861667958784">http://www.yatonggroup.com/viewfilebizce/1844202861667958784</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Minor Non- Conformance	The Entity has established and implemented a Dross Management Procedure and a Solid Waste Management Procedure. Dross residue (aside from Aluminium ash slag) is stored in a dedicated warehouse, which is appropriately labelled. The ground surface of the warehouse has been treated to prevent the release of Dross and leachate to the environment. The Dross and Dross residues are transferred to a licensed company for reuse/recycling.
		However, deficiencies were observed in the handling of Aluminium ash slag. The Aluminium ash slag produced by the smelting workshop is collected in boxes by the workshop and stored in the open air outside of the factory building and no other protective measures are taken.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non- Conformance	The Entity has developed a water management program and conducted a water risk assessment. The Entity's water balance is updated annually. The assessment determined that the Entity's water-related risks are low.

CRITERION	RATING	COMMENT
		The Entity has not however publicly disclosed its water withdrawal and use.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as it is not a key water user and the risk assessment determined that the Entity has low risk of impacts to water.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has provided an analysis of ecological and Biodiversity impact factors in an Environmental Impact Assessment report, which was conducted by a third party. The assessment determined that the Entity is not located in or near a Protected Area and the risks and impacts on Biodiversity are considered low.
		The Entity has published the assessment result information in the Biodiversity Assessment Report on its website at:  http://www.yatonggroup.com/viewfilebizce/1844202805045915648
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 identified in the risk assessment are documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified in the risk assessment are documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified in the risk assessment are documented as low.
8.4 Alien Species	Conformance	The Entity regularly assesses the risk of introduction of Alien Species and has implemented appropriate control measures. At the time of the Audit, no incidents of introduction of Alien Species had occurred.
		The Entity has prepared a Biodiversity Assessment Report to assess the possibility of accidental or intentional introduction of Alien Species and the potential risks that may be caused, and to establish control measures. The Biodiversity Assessment Report is disclosed at: http://www.yatonggroup.com/viewfilebizce/1844202805045915648
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located within a government-designated industrial zone.  The Entity has pledged not to explore or build New Projects in a World Heritage site.
8.6a-d Protected Areas	Conformance	The Entity is located within a government-designated industrial zone that is not within 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		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented a Human Rights Policy and has conducted Human Rights Due Diligence. The Entity regularly reviews labour and business ethics guidelines to identify potential impacts on Human Rights. The Entity has established channels to resolve grievances, complaints and suggestions.
		The Audit identified no control gaps in the Human Rights Due Diligence process. The Human Rights Due Diligence Report is disclosed at <a href="http://www.yatonggroup.com/viewfilebizce/1857331567413571584">http://www.yatonggroup.com/viewfilebizce/1857331567413571584</a>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed a Procedure for the Protection of Female Employees and is committed to protecting the rights and interests of women. The Human Resources Department is ultimately responsible for the procedure's implementation. The Entity declares that any Harassment of female employees is prohibited. The Entity's gender equality and women's rights plan is reviewed every five years or when any changes or control deficiencies occur. The Entity publicly discloses the results of measures taken to protect the rights and interests of female employees in their annual Sustainability Report. The Entity's 2024 Sustainability Report is accessible at: http://www.yatonggroup.com/viewfilebizce/1844202861667958784
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within their Area of Influence. Regardless, the Entity respects the rights of Indigenous Peoples and has publicly disclosed the latest version of the Indigenous Protection Policy in their Code of Conduct, available at:  http://www.yatonggroup.com/viewfilebizce/1857331114955845632
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 within their Area of Influence, and no New Projects or Major Changes have commenced since the Entity became an ASI Member. The Entity has however established the Indigenous Peoples Protection Procedure, which provides respect for the customs, rights and interests of ethnic minorities and local residents in the region.
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 within their Area of Influence, and no New Projects or Major Changes have commenced since the Entity became an ASI Member.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within their Area of Influence, and no cultural and/or religious sites have been identified nearby. The Entity does however have procedures in place to protect cultural sites and sacred religious sites and maintains records of surveys and assessments of Indigenous Peoples and heritage sites.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within their Area of Influence, and no cultural and/or religious sites have been identified nearby.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Conformance	No resettlement or displacement has occurred due to the Entity's activities since the Entity joined ASI. The Entity has developed an Indigenous Peoples protection and Free, Prior and Informed Consent management process to prioritize feasible alternatives when designing New Projects and Major Changes to avoid or minimize population displacement. A review is required if there is any indication of a significant change in the conditions under which the plan was developed or a control deficiency.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established Procedures to respect the legal and traditional rights of Local Communities to their lands, livelihoods and use of natural resources, while exploring opportunities to respect and support their livelihoods within the industrial zone. Interviews undertaken during the Audit confirmed that the Entity does not have any indication of control gaps in these procedures. Approximately 80-90% of the Entity's employees are local residents.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a management procedure for the prohibition of the use of conflict minerals, which sets out how to conduct Due Diligence as well as makes commitments not to contribute to armed conflict or Human Rights violations. The Entity uses these procedures to identify risks in the supply chain and addresses identified risks. All the Entity's suppliers are in China, and all suppliers have signed agreements not to use minerals from Conflict Affected and High Risk Areas (CAHRA). The Entity's responsible sourcing and Due Diligence Policy has been disclosed within their Sustainability Report at: http://www.yatonggroup.com/viewfilebizce/1844202861667958784
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non- Conformance	The Entity has established a management procedure that prohibits the use of conflict-affected minerals and has undertaken a conflict-free minerals survey. The survey report results identified no risks of armed conflict or Human Rights violations in the Entity's supply chain. Interviews undertaken during the Audit confirmed that all Primary Aluminium is sourced from domestic intermediaries. The Entity has completed the risk identification of these intermediaries and maintained supplier investigation records.  However, the Entity's intermediaries have not disclosed the sources of their Primary Aluminium, making it impossible to trace the ultimate origin of the upstream Primary Aluminium and the associated risks.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a management procedure for the prohibition of the use of conflict minerals.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has established a management procedure prohibiting the use of conflict minerals, which stipulates that sourcing from CAHRAs is not allowed. The Entity's supplier audit report and conflict-free mineral survey report were reviewed as part of this Audit.  The Entity's Due Diligence practices were audited as part of this Audit, which fully meets the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	- Conformance	The Entity has disclosed the results of their supply chain Due Diligence and conflict minerals investigation in their 2024 Sustainability Report

CRITERION	RATING	COMMENT
		which is accessible at: http://www.yatonggroup.com/viewfilebizce/1844202861667958784
9.9 Security practice	Conformance	The Entity is located in the Yatong Industrial Park, and the Entity's parent company, Yatong Group, is responsible for the security of the park. The Group has established a security management system and procedure. The procedure stipulates that security guards and related parties need to respect Human Rights; and compliance was confirmed through interviews in this Audit.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has a process that allows Workers to freely choose their own Workers' representatives. Each department within the Entity has an employee representative who is responsible for monitoring and raising issues related to safety, health, welfare and social issues with management. Worker representatives are elected at Worker meetings, the most recent of which was held in March 2024. The Entity has established a Procedure for the Administration of Trade Union Freedom and Collective Bargaining Rights, which supports Worker rights. There is a Collective Bargaining Agreement between the Entity and Workers. All terms of the Agreement comply with Applicable Law.
10.2a-c Child Labour	Conformance	The Entity has developed and implemented a Child Labour Policy and Remedial Action Management Procedure that prohibits the use and/or employment of Child Labour. The Entity has processes in place to ensure that younger Workers (16 to 18 years of age) are not exploited, work in hazardous conditions, or have their studies or apprenticeships compromised. At the time of the Audit, the Entity's youngest Worker was over 18 years of age.
10.3a-c Forced Labour	Conformance	The Entity has developed and implemented a Prohibition of the Use of Forced Labour Management Procedure, which involves control measures to ensure that it does not directly or indirectly participate in or support Human Trafficking and associated practices. The Entity has publicly posted a Statement against Modern Slavery and Human Trafficking and employees have received relevant training.  The Entity's Statement against Modern Slavery and Human Trafficking is disclosed on their website at: <a href="http://www.yatonggroup.com/viewfilebizce/1857331471295361024">http://www.yatonggroup.com/viewfilebizce/1857331471295361024</a>
10.4a-c Non-Discrimination	Conformance	The Entity has formulated and implemented a Prohibition of Discrimination Management Procedure, established an effective supervision mechanism, and carried out Human Rights Due Diligence questionnaires to ensure the implementation of the non-discrimination principle in all business activities. After reviewing recruitment information and interviewing employees, the Entity organized training, publicity and complaint channels to promote and encourage a culture of non-Discrimination. The Entity has established a Grievance Mechanism to handle Discrimination complaints.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has established and implemented the Employee Complaint (Appeal) Management Procedure and Employee Satisfaction Survey Management Regulations. Employees can directly contact Environmental, Health and Safety (EHS) representatives or employee representatives to resolve workplace issues. The communication mechanism for feedback is appropriate and the channels are effective.
10.6a-g Violence and Harassment	Conformance	The Entity has developed the Prohibition of Mental and Physical Abuse Management Procedure which addresses Violence and Harassment. The procedures establish mechanisms where employees can file complaints and feedback on unfair treatment related to Violence and Harassment. The Entity has conducted internal audits and annual management reviews of the procedures.
		The Entity has disclosed its Human Rights Policy which addresses Violence and Harassment as part of its Code of Conduct on their website which is accessible at: http://www.yatonggroup.com/viewfilebizce/1857331114955845632
10.7a-c Remuneration	Minor Non- Conformance	The Entity has established written procedures that set out the terms and conditions of employment, which are provided to all Workers. The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week exceed the legal standard. Based on Worker interviews and document review, wages are paid promptly via bank transfer. All employees are covered by social insurance.  However, it was determined during the Audit that individual employees received payment less than the legal requirement for annual leave.
10.8a-c Working Time	Minor Non- Conformance	The Entity's employee handbook clearly states the employee working hours requirements. The Entity implements employee working hours in accordance with the local Labor law, implementing a three-shift system.
		However, it was identified during the Audit that some employees did not receive the requirement of one day off for every seven days of work, and the average working hours in a workday for Workers in a particular workshop exceeded 9.5 hours over six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established policies and informed employees of their right to Freedom of Association and Collective Bargaining by means of training, email, notice and regular meetings.
11. OCCUPATIONAL HEALTH A	AND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non- Conformance	The Entity has established an Occupational Health and Safety (OH&S)  Management System and obtained ISO 45001:2018 certification.
		However, the Audit identified a number of practices on site that do not meet best practice OH&S standards, which presented a risk to Workers.
		The ISO 45001:2018 certificate has been disclosed at: http://www.yatonggroup.com/viewfilebizce/1857331698874265600

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has developed relevant management manuals and procedures and has trained all employees and Stakeholders to understand and comply with OH&S requirements. The OH&S Management System is subject to external audits annually and recertification audits every three years. Internal audits are conducted annually and/or after changes in OH&S risks and/or signs of control deficiencies. The Entity discloses a comparative analysis of performance with peer companies and leading practices on their website:  http://www.yatonggroup.com/viewfilebizce/1857330857769349120
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an OH&S Management System and obtained the ISO 45001:2018 certificate. The Entity has established an effective mechanism to collect employee feedback on OH&S issues, including suggestion boxes, employee representative meetings and employee interviews.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 March 2025	Initial Certification Audit – Full Certification