

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Jiangsu Lizhong New Material Technology Co., Ltd.

CERTIFICATE NUMBER
439

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM

**SGS-CSTC
STANDARDS
TECHNICAL
SERVICES**

DATE OF ISSUE
22 APRIL 2025

DATE OF EXPIRY
21 APRIL 2028

CERTIFIED SINCE
22 APRIL 2025

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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

Melting, alloying and casting
process for the design and
manufacture of cast Aluminium
alloy at Jiangsu Lizhong New
Material Technology Co., Ltd.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lizhong Group
ENTITY NAME	Jiangsu Lizhong New Material Technology Co., Ltd.
CERTIFICATION SCOPE	Melting, alloying and casting process for the design and manufacture of cast Aluminium alloy at Jiangsu Lizhong New Material Technology Co., Ltd.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">23 - 27 December 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">13 January 2025
AUDIT SCOPE	<p>The Audit Scope included melting, alloying and casting process for the design and manufacture of cast Aluminium alloy at Jiangsu Lizhong New Material Technology Co., Ltd.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	22 April 2025 – 21 April 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	21 October 2026
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CERTIFICATE NUMBER	439
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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

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

ENTITY OVERVIEW

The Entity commenced operations in 2020 and is located at 188 North Suzhongbeilu Road, Anyi Town, Baoying County, Jiangsu, China. It specialises in producing cast Aluminium alloy ingots and cast Aluminium alloy liquid, primarily serving domestic customers.

The Entity is equipped with seven smelting units, four thermal insulation units, six Dross removal machines, and one cold ash bucket. With 125 employees, the Entity has an annual production capacity of 20,000 tonnes of Aluminium alloy ingots and 98,500 tonnes of Aluminium alloy liquid.

The facility covers a total building floor area of 17,830 square metres and is equipped with infrastructure, including passageways, parking lots, warehouses, canteens, and staff activity rooms. There are no sensitive populations or community organisations in the vicinity of the Entity.

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	High	Medium	Medium	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain compliance with Applicable Law. Its published ESG Sustainability Report includes findings of its labour and Human Rights compliance risk assessment and confirms that no significant fines, judgments, penalties or non-monetary sanctions were incurred for legal violations in 2023.
1.2 Anti-Corruption	Conformance	The Entity has established supervision and management departments responsible for the receipt, compilation and management of complaints and reports. It has also implemented anti-Bribery and ethics rules that are applicable to all personnel. Additionally, the Entity has developed an internal Complaint Management System, available at: http://www.lizhong.com.cn/uploads/tinymce/images/066473fedc8212e3548f604205987b0e672af8f13f55a.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, endorsed by Senior Management, which includes principles related to Environmental, Social and Governance (ESG) performance, available at: http://www.lizhong.com.cn/uploads/tinymce/images/514324121d7d3046786a10f5bf5026536753a5a1353d5.pdf An annual ASI internal audit and management review is conducted to ensure the effective operation of the Entity's system.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Environmental, Social, and Governance (ESG) Policy has been established and implemented. Documented Policies on environmental protection, Occupational Health and Safety (OH&S), ASI performance, and energy management, which are all approved by the General Manager, are maintained. The ESG Policy has been communicated internally through training sessions and displayed on the plant's notice board. It is reviewed annually and available at: http://www.lizhong.com.cn/uploads/tinymce/images/514324121d7d3046786a10f5bf5026536753a5a1353d5.pdf
2.2a-c Leadership	Conformance	The Entity has appointed the Director of Management as the ASI Management Representative, responsible for authority for ensuring compliance with ASI Performance Standards.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented an integrated Management System and obtained ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented an integrated Management System, obtaining certifications such as IATF 16949, ISO 14001 and ISO 45001. Additionally, a SA8000:2014 Management Manual has been developed to address risks related to Human and Labour Rights.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a Responsible Procurement Policy addressing environmental, social and governance issues, available at: http://www.lizhong.com.cn/uploads/tinymce/images/55c972eadbffe5644ae41d70b50c47056753a6e0831b4.pdf</p> <p>However, it has not provided evidence of communicating the Policy to suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or significant changes to existing Facilities. However, the Entity has disclosed its Environmental and Social Impact Management Plan at: http://www.lizhong.com.cn/uploads/tinymce/images/8680423f7fle7fbaf05c20d386fdc566753de97ccd7.pdf</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or significant changes to existing Facilities. However, the Entity has disclosed the Human Rights Impact Assessment Report of the existing project at: http://www.lizhong.com.cn/uploads/tinymce/images/d71470652f2f2d958603050af75952d76753a644ab527.pdf</p> <p>and the Human Rights Impact Commitment at: http://www.lizhong.com.cn/uploads/tinymce/images/c1eb2ba98ce87d6cef69e3042043f92a6753a61f4aaal.pdf</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed an Emergency Preparedness and Response Control procedure to manage and control potential accidents and emergencies. It includes four specialised plans, including the Special Plan for Fire and Explosion Accidents and the Special Plan for Hazardous Chemicals Accidents, as well as eight site-specific disposal plans, including the Site Disposal Plan for Diesel Leakage, Fire, and Explosion Accidents. Additionally, the Entity has developed an annual emergency drill response plan for specific sites, which has been registered with the local government. The Entity also conducts drills to assess the effectiveness of these Plans</p> <p>The Emergency Plan for Environmental Incidents is available at: http://www.lizhong.com.cn/uploads/tinymce/images/44548eb80687ba949e9a10b1013a5a9567d8cdd4d6d7f.pdf</p> <p>The Emergency Plan for Production Safety Accidents is available at: http://www.lizhong.com.cn/uploads/tinymce/images/9a5721b06cf5d454f0d172d9cb59b52767d8cd8d5d4ce.pdf</p>
2.8a-d Suspended Operations	Not Applicable	<p>This Criterion is not applicable to the Entity, as no changes to the Business or control gaps have been identified. The Suspended Operations Management Regulation and Business Resilience Plan have been established and implemented.</p>
2.9a-b Mergers and Acquisitions	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Mergers or Acquisitions have occurred. However, the Entity has established a procedure for reviewing environmental, social, and governance issues during Due Diligence for potential Mergers and Acquisitions.</p>
2.10a-b Closure, Decommissioning and Divestment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Closure, Decommissioning, or Divestment has occurred. However, the Entity has established a procedure to review environmental, social, and governance issues during the planning process for Closure, Decommissioning, and Divestment.</p>

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its 2023 Sustainability Report at: http://www.lizhong.com.cn/uploads/tinymce/images/071f7184373227df87372a301d864a7d6753d8d9ff45.pdf</p> <p>It outlines the Entity's significant impacts on environment, society, and economy, covering areas such as Occupational Health, environmental protection, labour rights, and Business ethics. The Report was approved by the General Manager and submitted to the enterprise group in February 2024.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>In 2023, the Entity incurred no fines, judgments, penalties, or non-economic sanctions. The results of the 2023 national corporate credit inquiry are disclosed in its ESG Sustainability Report, available at: http://www.lizhong.com.cn/uploads/tinymce/images/071f7184373227df87372a301d864a7d6753d8d9ff45.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity makes legally or contractually required payments to governments. Its tax record is available in its ESG Sustainability Report, page 10, at: http://www.lizhong.com.cn/uploads/tinymce/images/071f7184373227df87372a301d864a7d6753d8d9ff45.pdf</p> <p>The Entity's donation record is available at: http://www.lizhong.com.cn/uploads/tinymce/images/5c7feba8ddc9da6fb70b830450c34e296753df3b9b196.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established accessible, transparent, understandable, and culturally sensitive mechanisms to address Stakeholder Complaints, Grievances, and information requests related to its operations, available at: http://www.lizhong.com.cn/uploads/tinymce/images/4d1c5bacd944a3660def10f50da17d8c6753aadb0e00e.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has established a GHG inventory procedure and also developed a Life Cycle Assessment Verification Statement of cast Aluminium products, using primary and recycled Aluminium ingots as raw materials. However, the LCA report is incomplete as it lacks actual procurement data for primary and recycled Aluminium, and the source of emission factors is unspecified.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has implemented a greenhouse gas inventory program to meet customer requirements. A third-party organisation has verified the Entity's LCA report for cast Aluminium products.</p> <p>However, the report boundary addresses only the period from the entry of raw and auxiliary materials into the Entity to the product's exit from the Entity, rather than applying a 'cradle to gate' scope. The report lacks basic assumptions and restrictions.</p> <p>The LCA reports for both cast primary Aluminium alloy ingots and cast recycled Aluminium alloy ingots, addressing environmental impact categories, are available at: http://www.lizhong.com.cn/uploads/tinymce/images/54f3b1045a7a042f338ea9ebb0e1c2876753d8ff2d669.pdf and</p>

CRITERION	RATING	COMMENT
		http://www.lizhong.com.cn/uploads/tinymce/images/718467b59abcb5592bc52ca7ea949fe06753da096954b.pdf
4.2 Product Design	Conformance	The Entity mandates that product contracts be evaluated based on recycling and sustainability objectives, including the percentage of recycled materials used, as well as goals for reducing environmental impact, including fuel and power loss control. It conducts monthly energy consumption analysis in accordance with the 2024 production system process indicator plan.
4.3a-b Aluminium Process Scrap	Conformance	The Entity classifies Process Scrap by Aluminium product type and grade and recycles all material, thereby achieving a 100% recycling rate. All quantity data are traceable.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity has outlined a Scrap Aluminium recycling plan, setting a strategic goal of 100% recycling and reuse of Aluminium Scrap, with a defined timetable. For post-consumer Scrap recycling, the Entity has signed residual material processing agreements with several companies. Its recycling strategy is available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/ac4b81cfbe9d368be43f08390a2e67d96753a9cac59e5.pdf</p> <p>While the Entity commits to reviewing its recycling strategy every five years, it has not publicly disclosed the specific implementation timeline or measures.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed a Scrap Aluminium recycling plan, achieving 2023 recycling returns that exceeded targets. As part of its strategy, the Entity committed to 100% recycling and reuse of Aluminium Scrap, supported by a clear implementation timeline. For post-consumer Scrap, it has developed a recycling strategy in collaboration with upstream suppliers and downstream customers, while actively engaging in industry conferences.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has engaged a third-party to assess its greenhouse gas emissions and energy use. In 2023, the verified greenhouse gases included carbon dioxide (CO₂), methane (CH₄), nitrogens of oxide (NO_x), and hydrofluorocarbons. The emission inventory covers the January to December period and includes Categories 1 through 4; Categories 5 and 6 were not quantified.</p> <p>Total emissions amounted to 140,138 tonnes of CO₂e. However, based on the Entity's annual output, the calculated average product carbon footprint is significantly lower than the industry average, which appears inaccurate.</p> <p>The greenhouse gas inventory statement is available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/24ed9de2fba2727964ffb40c79ea4f2f6753a5f24baed.pdf</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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	Conformance	<p>The Entity has published a time-bound greenhouse gas (GHG) reduction target, covering both direct and indirect emissions. It has used the ASI Entity-level GHG reduction pathway method to calculate the 2024–2027 slopes for casting processes and casting procurement, using 2023 as the baseline year. The GHG reduction plan is available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/992645449638b8641e9a44713a23313b6753e6e0b3ad4.pdf</p> <p>A GHG control and management procedure is in place, requiring an annual review of the GHG inventory. The Entity will update the reduction plan and pathway based on changes in Business operations. The Entity's GHG emissions are generally managed in compliance with established procedures.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed the Life Cycle Assessment Management Regulations and outlined a plan to reduce GHG emissions. This plan targets emissions from raw materials, production processes, energy resources, and carbon Management Systems to align with emission reduction goals. The Entity also regularly and publicly discloses its emission reduction performance.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has obtained ISO 14001:2015 certification and implemented Management Systems for monitoring particulate matter monthly, hydrogen chloride quarterly, nitrogen oxides (NOx) in real-time, sulphur dioxide (SO₂) monthly, and Ringelmann blackness scale semi-annually. The Entity holds air pollutant emission permits and conducts regular monitoring as required. The Entity tracks annual progress on emission reduction targets. The 2023 emissions and the 2024 emission reduction plan are available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/57351bb8713f1c5cf7dc3d0101e9747e6753aa152b059.pdf</p> <p>The Entity has also installed emission purification facilities as per the Environmental Impact Assessment (EIA) report to mitigate the adverse effects.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity manages water discharges using pollutant treatment facilities and conducts regular monitoring to ensure compliance with local discharge limits. No production wastewater is generated. The Entity has quantified and reported discharges with potential adverse effects on human health and the environment. The 2023 emissions data and the 2024 emission reduction plan are both available at:</p> <p>http://www.lizhong.com.cn/uploads/tinymce/images/57351bb8713f1c5cf7dc3d0101e9747e6753aa152b059.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has assessed potential risks to air, water, and soil pollution, and developed the Environmental Factor Identification and Evaluation Control procedure to assess potential Leakage risks annually. The relevant emergency plan is available at:</p>

CRITERION	RATING	COMMENT
		http://www.lizhong.com.cn/uploads/tinymce/images/49621577659dbecbcd60ec4f8f1167576753d8ad93da7.pdf However, the identification process is incomplete and further improvements are needed. During the Audit, it was noted that a small amount of Aluminium ash was on the ground at the dust removal ventilation area, and water stains were observed one metre away from the dust collection bag, both presenting environmental pollution risks. Additionally, one of the collection bags in the dust removal area was damaged, further contributing to the risk.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has developed an Emergency Preparedness and Response Control procedure, which requires notifying the surrounding village leaders in the event of a Leakage, including potential impacts and affected individuals. Additionally, the Entity has developed an Environmental Factor Identification and Evaluation Form that includes risk assessments for natural gas and Aluminium liquid Leakages. The Entity's Sustainability Report (page 10) indicates no Leakages occurred during 2023, available at: http://www.lizhong.com.cn/uploads/tinymce/images/071f7184373227df87372a301d864a7d6753d8d9ff45.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity's solid Waste management procedure outlines strategies for minimising, reusing, sorting, and disposing of Waste. Waste reduction is achieved through optimisation technology, and a risk assessment is conducted for Waste disposal. The Entity has published its 2023 emissions and 2024 reduction plan for pollutants and solid Waste at: http://www.lizhong.com.cn/uploads/tinymce/images/57351bb8713f1c5cf7dc3d0101e9747e6753aa152b059.pdf and http://www.lizhong.com.cn/article/show/426.html
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has established and implemented a Hazardous Waste pollution prevention and control system. Waste residues are stored in a designated, clearly labelled warehouse with a leak-proof hardstand floor to prevent environmental discharge of Waste or leachate.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The Entity's annual water consumption is under 500,000 cubic metres, and it is not classified as a key water-using unit in Jiangsu Province. Water is supplied by Yuehai Water Co., Ltd. via the Anyi Town Municipal Tap Water Network. Water use on site primarily includes toilet flushing, employee bathing, and canteen operations. In production, water is mainly used for cooling circulation and is fully recycled within the system, with no external wastewater discharge. Domestic sewage originates from the office building, canteen, and restrooms. It is collected via the Entity's sewage network and discharged to the Baoying Xianhe Sewage Treatment Plant.

CRITERION	RATING	COMMENT
		<p>The Entity has conducted a water resource risk assessment and discloses the report. However, the report only mentions total water consumption and lacks information relating to the water source and type used.</p> <p>The water resource risk assessment is available at: http://www.lizhong.com.cn/uploads/tinymce/images/2085fdd5b68c3181c7dda83855d19fa36753ab2cb31d2.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as there were no significant 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	<p>The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services as low. Relevant control measures and Alien Invasive Species assessment are outlined in Biodiversity Assessment Report, page 6, at: http://www.lizhong.com.cn/uploads/tinymce/images/03c1986d1169725378fcd400aec50c5f6753a981b2062.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Service as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Service as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as no Priority Ecosystem Services has been identified.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or intentional introduction of Alien Species that could harm Biodiversity. No such Alien Species have been introduced.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is located in a Government-designated industrial zone and has committed not to pursue or develop New Projects within the World Heritage sites.
8.6a-d Protected Areas	Conformance	The Entity operates within a Government-designated industrial zone, which is not located near any Protected Areas.
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	The Entity's Human Rights Impact Assessment Report states the need to safeguard the rights of female employees, establish a dedicated complaint channel, and implement training and satisfaction surveys.

CRITERION	RATING	COMMENT
		<p>The Entity has made no changes, and no Human Rights control gaps have been identified. The Entity's Human Rights Policy is available at: http://www.lizhong.com.cn/uploads/tinymce/images/c1eb2ba98ce87d6cef69e3042043f92a6753a61f4aaal.pdf</p> <p>The Entity has also issued Regulations on the Prohibition of Discrimination and Special Protection of Female Workers, which clearly define women's rights and anti-Discrimination requirements. On-site interviews with management and staff confirmed that no Human Rights violations have occurred.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity recognises and safeguards the legitimate rights and interests of women, implementing control measures to ensure their fulfillment. The Prohibition of Discrimination and Special Protection of Women Workers outlines the organisation's procedures for protecting these rights. The Entity reports annually on the effectiveness of its gender equality initiatives in its ESG Sustainability Report, available at: http://www.lizhong.com.cn/uploads/tinymce/images/071f7184373227df87372a301d864a7d6753d8d9ff45.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence. However, the Entity has established regulations on protecting Indigenous Peoples and managing Free, Prior and Informed Consent (FPIC), requiring respect for the customs and rights of ethnic minorities and local residents. The regulations are available at: http://www.lizhong.com.cn/uploads/tinymce/images/bff2a6a3926b9a60783fad4c07203afd6753d87f10123.pdf</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	<p>This Criterion is not applicable to the Entity, as it is located in a Government-developed industrial park with no Cultural or Sacred Heritage sites present. Nevertheless, the Entity remains committed to protecting Heritage sites and values.</p>
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage sites within the Entity's Area of Influence.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity as no Resettlement actions have been initiated. The Entity has a Resettlement management procedure in place. Located in the Anyi Town Industrial Concentration Zone, confirmed by the 2021 Environmental Impact Assessment, the area is designated for industrial use, and no Resettlement is required.</p>

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	There are no residential areas or sensitive populations within one kilometre of the Entity. The Entity sought feedback from nearby Businesses and informed the local community during construction. As there are no New Projects or migrants involved, no immigration review or Resettlement plan disclosure is required.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has established conflict mineral management regulations, which require procurement to identify supply chain risks in Conflict-Affected and High-Risk Areas (CAHRA), and their surroundings, and adjacent countries, and propose response plans. A review of the Conflict-Affected and High-Risk Area (CAHRA) records confirmed that all suppliers are from China.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has established conflict mineral management regulations and conducted a risk assessment. Interviews with management and a review of purchase orders confirmed that the Entity sources raw material of Aluminium from manufacturers in China. No raw materials are procured from other countries. The risk assessment concluded that there is no risk of armed conflict or Human Rights violations in the supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the Entity sources raw material from China, and the risk assessment concludes there is currently no risk of armed conflict or Human Rights abuses in the supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	Due Diligence was conducted in compliance with conflict mineral and Due Diligence management regulations. Records of Due Diligence are maintained. The Entity's Due Diligence practices and risk assessment were reviewed during the ASI Audit, and the practices were deemed feasible.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity has established conflict mineral management regulations, conducted risk assessments and disclosed the information in its Sustainability report, available at: http://www.lizhong.com.cn/uploads/tinymce/images/07f7184373227df87372a301d864a7d6753d8d9ff45.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices that uphold Human Rights. This procedure mandates that security guards respect Human Rights, and all guards have been trained on these requirements. There have been no security-related Human Rights violations.
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 established regulations governing Freedom of Association and Collective Bargaining, which define these rights. The Labour Union was formed in compliance with the Chinese Labour Union Law. Workers' representatives can voice Workers' concerns to management. The Entity is committed to respecting Workers' rights, and the Workers' association was established in accordance with legal requirements.

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	The Entity has developed a strict Policy against Child Labour. There are no cases of Child Labour or underage Workers in the unit; the youngest employee is 22 years old. In compliance with Chinese law, Workers aged 16 to 18 are specially protected and prohibited from working in hazardous conditions.
10.3a-c Forced Labour	Conformance	The Entity has established a prohibition of Forced Labor procedure and a Policy on Modern Slavery and Human Trafficking, which strictly prohibit Forced Labour, Human Trafficking, and Modern Slavery. This Policy applies to the Entity and its suppliers, emphasising the importance of compliance. Based on Worker interviews and document reviews, there are no instances of illegal wage deductions, debt bondage, debt repayment, or any other form of Forced Labour at the Entity. The Entity's Modern Slavery Statement is available at: http://www.lizhong.com.cn/uploads/tinymce/images/e046a949af13967c496b63399a1c2bb76753a6b38aefe.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established the management regulations on prohibition of Discrimination and special protection of women Workers and the Employee Handbook, which ensure equal opportunities and prohibit Discrimination in recruitment, salary, promotion, training, job opportunities, or dismissal based on sex, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other discriminatory factor, in compliance with International Labor Organization (ILO) Conventions C100 and C111. The Entity is committed to non-Discrimination, and no Discrimination instances have been reported.
10.5 Communication and engagement	Conformance	The Entity maintains direct and frequent communication with Workers and their representatives about working conditions and the resolution of workplace and compensation issues, without fear of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures in compliance with legal requirements. A Human Rights Policy has been implemented to prohibit Violence and inhumane treatment, available at: http://www.lizhong.com.cn/uploads/tinymce/images/c1eb2ba98ce87d6cef69e3042043f92a6753a61f4aaal.pdf Worker interviews undertaken during the Audit confirmed no Violence or Harassment has occurred within the Entity.
10.7a-d Remuneration	Conformance	The Entity has a clear wage structure, with a monthly comprehensive wage that meets or exceeds local minimum wage requirements. It provides five insurances and one fund for all employees. The total wage covers Workers' basic needs, and all employees participate in the mandatory social insurance program. A salary management procedure is in place to ensure monthly wage payments in legal currency, with complete records.
10.8a-c Working Time	Minor Non-Conformance	The Entity's working hours and Overtime regulations define employee work-hour requirements. The Entity operates on both two- and three-shift schedules. Based on employee interviews and attendance records, daily Overtime does not exceed legal limits. However, some employees work up to 48 hours of Overtime per month and a few

CRITERION	RATING	COMMENT
		works up to nine days without the required one day off every seven days.
10.9a-b Informing Workers of Rights	Conformance	The Entity has implemented Policies and informed employees of their rights to Freedom of Association and Collective Bargaining through training, emails, notices, and regular meetings. A management procedure is in place to ensure all employees can freely join Labor Unions and engage in Collective Bargaining without fear of retaliation.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification. However, during the Audit, it was observed that welders performing maintenance work were found not wearing Personal Protective Equipment (PPE).
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity is ISO 45001:2018 certified, with its OH&S system audited by the certification body every three years. However, it has not disclosed any comparative analysis of its performance against peer Businesses or industry best practices.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an OH&S Management System certified under ISO 45001:2018. It has also established a mechanism enabling Workers to raise, discuss, and help resolve Health and Safety issues with management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 April 2025	Initial Certification Audit – Full Certification