

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Lizhong Sitong Light Alloys Group Co., Ltd.

CERTIFICATE NUMBER

166

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

TÜV RHEINLAND
CERT GmbH

DATE OF ISSUE

10 DECEMBER 2024

DATE OF EXPIRY

9 DECEMBER 2027

CERTIFIED SINCE

10 DECEMBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be "J. He", with a long horizontal line extending to the right.

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

Design and manufacture of
Aluminium-based master alloy,
copper-based master alloy, special
alloy, metal additives and fluxes in
the Lizhong Sitong Light Alloys
Group facility located in Baoding
City, Hebei Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lizhong Group
ENTITY NAME	Lizhong Sitong Light Alloys Group Co., Ltd.
CERTIFICATION SCOPE	Design and manufacture of Aluminium-based master alloy, copper-based master alloy, special alloy, metal additives and fluxes in the Lizhong Sitong Light Alloys Group facility located in Baoding City, Hebei Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 – 11 June 2019)Surveillance Audit (29 – 30 May 2023)Re-Certification Audit and Scope Change (6 – 7 January 2025)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">9 – 10 September 2021 (Initial Certification Audit)9 – 30 May 2023 (Surveillance Audit)6 – 7 January 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 November 2021 (Initial Certification Audit)2 August 2023 (Surveillance Audit)17 February 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 11 June 2019)</u></p> <p>The Audit Scope covers Lizhong Sitong Light Alloys Group Co., Ltd. (China), including the design and manufacture of Aluminium-based master alloy, copper-based master alloy, special alloy, metal additives and fluxes.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (29 – 30 May 2023)</u></p> <p>The Audit Scope covers Lizhong Sitong Light Alloys Group Co., Ltd. (China), including the design and manufacture of Aluminium-based master alloy, copper-based master alloy, special alloy, metal additives and fluxes.</p>

The supply chain activities included in the Audit Scope:

- Aluminium Re-melting/ Refining
- Casthouses
- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (6 -7 January 2025)

The Audit Scope included the design and manufacture of Aluminium-based master alloy, copper-based master alloy, special alloy, metal additives and fluxes in the Lizhong Sitong Light Alloys Group facility in Baoding City, Hebei Province, China.

Supply chain activities included in the Audit Scope:

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

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

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION PERIOD

10 December 2024 – 9 December 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

9 December 2026

CERTIFICATE NUMBER

166



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

Lizhong Sitong Light Alloys Group Co., Ltd. ('the Entity') is part of the Lizhong Group ('the Group') that was founded in 1998 and is located in the Qingyuan District, Baoding City, Hebei Province, in the Peoples Republic of China. The Entity produces and sells functional master alloys and specialises in production technology research and development. The Entity's products are widely used in diverse industries such as automotive, high-speed rail, aerospace, power appliances, consumer electronics, industrial Aluminium profiles, food and pharmaceutical packaging, plate printing and architectural decoration. The Entity supplies over 400 customers which are located both in China across Asia, Europe, America and Australia. The proportion of product sales is approximately 65% to the domestic Chinese market and 35% to the overseas market.

The Entity's main production processes include melting, reaction of fluoride salt, physical mixing and pressing. The Entity's facility has a production capacity of 132,000 tonnes per year. The Entity has eight workshops with 51 sets of electric furnaces, three sets of Aluminium melting furnaces, nine sets of casting machines, three sets of casting and extrusion machines, three sets of continuous casting and rolling mills, ten sets of cutting machines, four sets of rewinding machines and eight sets of block presses. The Entity maintains semi-finished product transfer warehouses and finished product warehouses. The Entity is equipped with a power station, air compression station, hazardous waste warehouse, and a general solid waste warehouse. Parking lots and protective fences with video surveillance have been established around the factory areas. The facility covers a total area of 182,000 square meters (m²).

The Entity currently employs around 500 Workers, including 110 female Workers. The Entity's main Stakeholders include shareholders, customers, partners, upstream supply chain entities, and government-related departments such as the tax authorities. The Entity's continuous development plan provides employment opportunities for nearby residents and drives the economic development of the surrounding areas.

The Entity is committed to research and development into the intelligent manufacturing of new functional master alloys, and invests significantly in research in order to better the performance of functional master alloys and promote the replacement of steel, copper and wood with Aluminium due to its social and environmental benefits.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to document all Applicable Laws and regulations covering areas such as Labour, ethics, the environment and Health and Safety. The Environmental Health and Safety (EHS) and Management Departments are responsible for the documentation of Applicable Law and for the assessment of the Entity's Compliance. This assessment of Compliance is conducted on at least a quarterly basis.
1.2 Anti-Corruption	Conformance	<p>The Entity has established a Business Ethics Policy which addresses Extortion and Bribery and provides training on this Policy to employees. An ethics reporting channel is included in the Entity's Sustainability Report which is accessible on the Entity's website at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>The Entity has completed a Due Diligence investigation to determine high-risk departments. The investigation identified the Purchasing, Sales, Quality and Warehouse Departments as of higher risk. All staff in these Departments have signed an anti-Bribery and anti-Corruption commitment letter.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct and periodically provides training to Workers on the Code. The Code of Conduct is disclosed on the Entity's website at: http://www.stnm.com.cn/uploads/tinymce/images/26ff5e5e5dc7078b7bdd206d64f0aaf8677f170796c46.pdf</p> <p>The Entity has communicated their Code of Conduct to their Suppliers who are required to sign an ASI Performance Standard (PS) commitment letter. The Entity's ASI Policy is included in the Sustainability Report and disclosed on the Entity's website at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintained a series of Policies consistent with their Environmental, Social and Governance (ESG) approach. The Policies have been approved by the Entity's General Manager. The Entity's Management Systems require the Policies to be reviewed annually as part of the Management Review process, on any changes to the business that could affect ESG risks, or on any indication of a control gap.</p> <p>The Policies are communicated internally through means such as employee orientation, training and display boards. The Policies are disclosed within the Entity's Sustainability Report which is accessible on the Entity's website at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p>
2.2a-c Leadership	Conformance	The Entity's Management Department Director has been appointed as the Management Representative to ensure that the environmental, social and governance requirements of the ASI Performance Standard are implemented in the Entity's operations. The authority and

CRITERION	RATING	COMMENT
		responsibilities for this role are defined in an appointment letter. An ASI Team has also been established to support the implementation of the Entity's ASI Management System.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System, which is certified against ISO 14001:2015. An annual compliance evaluation is conducted. Currently there are no fines or requests for corrective actions from government agencies or other Stakeholders.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System and complies with relevant legal Compliance requirements. An annual Compliance evaluation is conducted. Currently there are no fines or requests for corrective actions from government agencies or other Stakeholders.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has developed a Responsible Sourcing Policy that is integrated into their Sustainability Report, which is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>The Entity is committed to responsible sourcing, which is implemented through Supplier assessments, Supplier-signed commitment letters, and communications to Suppliers on the implementation of the ASI PS. Due Diligence investigation reports and Supplier audit reports are maintained and were reviewed during this Audit.</p> <p>Whilst the Entity has conducted Due-Diligence investigations on all Suppliers through Supplier self-assessments covering environmental, social and governance practices, the Entity has not verified some Due Diligence records to identify improvement opportunities for major 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 Major Changes to existing Facilities.</p> <p>The Entity has however evaluated the environmental, social, cultural and Human Rights impacts of their activities as part of the original project Environmental Impact Assessments.</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 Major Changes to existing Facilities.</p> <p>The Entity has however established a Human Rights Impact Assessment process and has disclosed their Human Rights Impact Assessment Report on their website.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established and implemented Emergency Response Plans in collaboration with potentially affected Stakeholder groups. Training on the Emergency Response Plans is provided periodically to employees. The Entity's production safety accident Emergency Response Plan is disclosed at: http://www.stnm.com.cn/uploads/tinymce/images/f32eaf9a5ac21851d03f52477fe2956965041656cefc5.pdf</p> <p>The Entity's Emergency Response Plan for environmental incidents is disclosed at: http://www.stnm.com.cn/uploads/tinymce/images/d6369cb62b6876d01cf77e9da643c4c7650416440bbc2.pdf</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Recovery Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Business Recovery Plan considers Material adverse ESG impacts from suspended operations. The Entity reviews its Business Recovery Plan every five years and has procedures in place to review the Plan on any indication of a control gap or after any changes to the Business that alter the nature or scale of ESG risks. Currently, no such controls gaps or significant changes have occurred that require such review.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Merger and Acquisition Control Procedure which incorporates a Due Diligence process. No merger or acquisition events have occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Closure, Decommissioning and Divestment Control Procedure. No closure, decommissioning and divestment events have occurred since the Entity's ASI Management System commenced operation or in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses an annual Sustainability Report at the Entity level and an annual ESG Report at Group level. The Entity also discloses a Group level integrated Annual Report.</p> <p>The Entity level Sustainability Report is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>The Group level ESG Report is accessible at: http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF</p> <p>The Group level Annual Report is accessible at: https://static.cninfo.com.cn/finalpage/2024-04-25/1219789919.PDF</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity publicly discloses information on any non-compliances or liabilities arising from failures to comply with Applicable Law. There were no fines received or other non-compliance issues in the past two years. If required, the Entity discloses any non-compliances or liabilities in their Group level integrated Annual Report which is accessible at: https://static.cninfo.com.cn/finalpage/2024-04-25/1219789919.PDF</p> <p>The Entity further discloses an annual statement on (non) violations which is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/9b9376c5f03333f9d4261972724e0e94677ffa20313f6.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has disclosed its payments to governments at a Group level in their most recent Integrated Annual Report, which includes a financial audit report issued by qualified Third Party. The 2023 integrated Annual Report is accessible at: https://static.cninfo.com.cn/finalpage/2024-04-25/1219789919.PDF</p>
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity has implemented an ASI Management System that tracks requests and complaints from Stakeholders. It has also implemented an appropriate Complaints Resolution Mechanism. The communication channels (telephone/email) are disclosed to internal

CRITERION	RATING	COMMENT
and Requests for Information		and external Stakeholders on the Entity's website at: http://www.stnm.com.cn/contact_us.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity provides 'cradle-to-gate' Life Cycle Assessment (LCA) information on its Aluminium Products covering all production processes and main supporting activities, such as melting, energy, transportation, recycling and waste disposition. The Entity provides a product LCA Report focusing on the entire value chain of one tonne of Aluminium Products. The Entity has also developed a carbon footprint report for Aluminium alloy Products. The evaluation results demonstrate the 'cradle-to-gate' life cycle carbon footprint of their AlMn20 and AlSi50 series Products.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has provided 'cradle-to-gate' LCA information on its Aluminium Products covering all production processes and main supporting activities, such as melting, energy, transportation, recycling and waste disposition.</p> <p>The Environmental Life Cycle Assessment Report is disclosed on the Entity's website at: http://www.stnm.com.cn/article/show/195.html</p> <p>LCA information is also disclosed in the Entity's Sustainability Report at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p>
4.2 Product Design	Conformance	The Entity has established the New Product Research and Development Procedure that requires the consideration of materials selection and utilisation during the production development and planning process. This Procedure aims to ensure appropriate process selection, improved process efficiency, equipment and load optimisation, process optimisation, extended service life, maintenance and cost-savings as well as improving Scrap management and disposal.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established a Waste/Scrap Management Procedure that sets a target for 100% of Process Scrap to be recycled. The Entity collects all Process Scrap generated in its operation, recycles the Scrap as raw material in the melting process and records the amount of Process Scrap in their daily summary report. Site observations during this Audit confirmed that this procedure is implemented effectively. Information on the management of Process Scrap is available in the Entity's 2023 Sustainability Report, page 15: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>Product component control is one of the requirements of the Entity's quality Management System. Process Scrap is identified with a unique batch number for traceability and alloy separation. The Audit confirmed that the Entity implements the Procedure and separates Aluminium alloys and grades for recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity has implemented a general recycling strategy for collection and recycling of Products at the End of Life.</p> <p>However no specific timelines or targets are defined in the Strategy and the Entity has not publicly disclosed its recycling strategy.</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity and its parent Group have undertaken efforts to engage with relevant local and national collection and recycling systems in respective markets to support accurate measurements and to increase End of Life recycling rates for products containing Aluminium.</p> <p>The Entity has signed a Scrap collection and recycling contract with an Aluminium component manufacturer and prepares a monthly Aluminium Scrap processing settlement statement to improve the Entity's recycling rate of Aluminium-containing Products in the relevant market.</p>

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has implemented a Management Procedure for Greenhouse Gas (GHG) Emission Calculation. In accordance with this Procedure Material Scope 1, 2 and 3 GHG emissions and energy use by source are tracked, calculated and documented annually. The energy consumption and major GHG emission sources are converted into GHG emissions data using a GHG Protocol defined by the Entity. The Entity has obtained ISO 14064-1:2018 Certification which includes verification of the GHG emissions data. The Entity has disclosed their GHG Report and ISO 14064-1:2018 certificate at: http://www.stnm.com.cn/article/show/212.html</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a time-bound GHG Emission Reduction Plan and GHG Emission Reduction Pathway that covers both direct and indirect emissions. The Entity has used the ASI Entity-Level GHG Reduction Pathways Method to calculate the 2024 to 2050 Casthouse process slope value and Casthouse procurement slope value using a 2023 baseline year, which is consistent with a 1.5°C warming scenario.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has used the ASI Entity-Level GHG Reduction Pathways Method to calculate the 2024 to 2050 Casthouse process slope (Scope 1 and 2) and Casthouse procurement slope (Scope 3 Category 1) based on 2023 as the baseline year, consistent with a 1.5°C warming scenario. The GHG Emission Reduction Plan and Emission Reduction Pathway includes an Intermediate Target covering a period of five years (2024-2028). The Entity reviews the GHG Emission Reduction Plan and Emission Reduction Pathway and progress annually. The GHG Emission Reduction Plan and Emission Reduction Pathway is disclosed on the Entity's website at: http://www.stnm.com.cn/article/show/214.html</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a GHG Management System Manual and GHG Inventory Procedure. The Manual and Procedure defines the GHG emissions control measures and annual analysis of GHG emissions according to the ISO14064-1:2018 standard to achieve performance

CRITERION	RATING	COMMENT
		<p>aligned with the targets in the GHG Emission Reduction Plan and GMG Emissions Reduction Pathway.</p> <p>The Entity's Board of Directors of the Entity's parent company Lizhong Group has responsibility for the Entity's GHG emissions. The Sustainable Development Division is established at the Group level under the Sustainable Development Committee as the daily carbon emission management institution. The Division has established a carbon management system by formulating carbon management procedures, processes and systems, improves the carbon emission management levels across the Lizhong Group and works towards carbon neutrality.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity measures their Emissions to Air including particulate matter, sulphur oxides (SOx) and nitrogen oxides (NOx) and quantifies these Emissions in their Environmental Impact Assessment report. The Entity has installed treatment facilities which are used effectively. Emissions to Air are monitored quarterly, and the monitoring demonstrates that emissions are below local legal limits. The Entity has disclosed their Emissions to Air on page 67 of their Group level Integrated Annual Report which is accessible at: http://static.cninfo.com.cn/finalpage/2024-04-25/1219789919.PDF</p> <p>The Entity has disclosed their Air Emission Reduction Plan at: http://www.stnm.com.cn/article/show/215.html</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has established a wastewater inventory to control their Discharges to Water. Industrial wastewater is classified as a Hazardous Waste and is collected and transferred to a qualified third party. No industrial wastewater is discharged offsite. Domestic wastewater is discharged to the local municipal system after pre-treatment by the internal wastewater treatment plant. The Entity has commissioned a qualified independent laboratory to monitor domestic wastewater discharges annually. This Audit did not identify any non-compliances issued by the local government nor any negative feedback reported by Stakeholders.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity commissioned a qualified third party to assess the risks of Spills and Leakages for the Facility and has established Emergency Response Plans (ERPs) for any such events. The Entity has also prepared an Environmental Factor Identification and Evaluation Form which includes a risk assessment and identification of natural gas and Liquid Aluminium Leakages. The ERPs have been approved by the local government. The assessment reports cover all the potential risks from Spills and Leakages. The Entity conducts annual drills against the ERPs. The Audit identified that adequate and effective control measures are implemented for all potential risks from Spills and Leakages.</p> <p>The Entity's Emergency Response Plan for environmental incidents is disclosed at: http://www.stnm.com.cn/uploads/tinymce/images/d6369cb62b6876d01cf77e9da643c4c7650416440bbc2.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has prepared an Emergency Preparedness and Response Control Procedure which stipulates that in the event of a Spill or Leakage the heads of surrounding villages must be notified of the potential impact. The Entity's annual Sustainability Report also</p>

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		discloses any Spills or Leakages. The 2023 Sustainability Report (page 20) confirms that no Spills or Leakages occurred in the reporting period. The Sustainability Report is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established a Waste Control Procedure as a part of their Environmental Management System. The Entity has implemented a Waste management strategy according to the Waste Mitigation Hierarchy. Wastes are collected and stored by the Entity before being transfer to vendors. The disposal of Hazardous Waste is conducted in Compliance with Applicable Law.</p> <p>The Entity publicly discloses their Waste generation and disposal on page 18 of their Sustainability Report at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>The Entity has disclosed their Waste Reduction Plan at: http://www.stnm.com.cn/article/show/215.html</p>
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 a Waste Control Procedure and implemented a Waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The amount of Dross generated is regularly monitored. Dross is sold to a delegated contractor that is responsible for the recycling of Aluminium from Dross and for disposal. The contractor achieves 100% resource recovery of Aluminium and does not landfill any Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity only uses municipal water for their water usage. The Entity has conducted a water-related risk analysis including a water balance analysis to identify and map its water withdrawal and use by source and type. The Entity's water consumption is not Material due to the nature of the Products, the production processes and the low quantity of municipal water withdrawal.</p> <p>Information on water related risks is disclosed in the Entity's Sustainability Report at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p>
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 has conducted a Biodiversity assessment as part of their Environmental Impact Assessment (EIA) which is mandatory under Applicable Law. The risk of impact by the Entity's activities in its Facility and Area of Influence on Biodiversity outcomes was assessed as low.

CRITERION	RATING	COMMENT
		The Biodiversity assessment engaged qualified Third Parties and approved by the local Environmental Protection Bureau (EPB). The Entity has disclosed the outcomes of the Biodiversity Risk Assessment Report on page 22-23 of their Sustainability Report at: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity have been assessed and documented as low. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity have been assessed and 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 to Biodiversity have been assessed and documented as low. No Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has assessed and identified the risks of the introduction of Alien Species during operational and transportation activities and assessed whether the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The risk was identified as low.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has committed to not exploring or developing New Projects in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as it is in an industrial park with no Protected Areas present.
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 established a gender-responsive commitment to respect Human Rights, promote gender equality and to comply with the UN Guiding Principles on Business and Human Rights. This commitment is integrated into the Entity's Conduct of Conduct: http://www.stnm.com.cn/uploads/tinymce/images/26ff5e5e5dc7078b7bdd206d64f0aaf8677f170796c46.pdf</p> <p>The Entity has established a Procedure to conduct Human Rights Due Diligence. Implementation of the Human Rights Policy and relevant performance were reviewed as part of this Audit. The Entity has disclosed their Human Rights Impact Assessment Report which includes information on the engagement approach for Affected Communities and the Complaints Resolution Mechanism. The Human Rights Impact Assessment Report is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/f1de89663e764fe3576c519a3ffc94d3677f18dfe1e8.pdf</p>

CRITERION	RATING	COMMENT
		<p>The Entity has identified the Affected Populations and Organisations as Stakeholders. The Entity's complaints and grievances channels are disclosed to all Stakeholders. Detailed information on the Complaints Resolution Mechanism is contained in the Entity's Sustainability Report: http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p> <p>No significant adverse Human Rights impacts are caused by or contributed to by the Entity's operation. The Entity commits to provide remediation or cooperate in remediation through legitimate processes if there is a negative impact on Human Rights identified or reported.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity's Code of Conduct commits to protecting female Workers and commits to respect and promote gender equity and women's empowerment within the Group. The Entity respects the rights and interests of women and develops activities to support work-life balance for all Workers and especially for women. The Entity's Conduct of Conduct is accessible at: http://www.stnm.com.cn/uploads/tinymce/images/26ff5e5e5dc7078b7bdd206d64f0aaf8677f170796c46.pdf</p> <p>Female Workers are paid at the same levels as male Workers. Female Workers are present in each Department, in the Management Team and on the Board. No Discrimination was noted during the Audit.</p> <p>The Entity has publicly disclosed information on their Gender Equity Policy and performance in their Group level ESG Report which is accessible at: http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity as the Entity's assessment reports identified no Indigenous Peoples within the Entity's Area of Influence. The Entity has however established and implemented Policies and Processes to ensure respect for the rights and interests of Indigenous Peoples.</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 the assessment reports identified no Indigenous Peoples within the Entity's Area of Influence. Additionally, there have been no New Projects or Major Changes since becoming an ASI Member in 2019.</p> <p>The Entity has however established and implemented a Stakeholder engagement process to manage communication with the Local Communities to obtain their major concerns on the impact of New Projects or existing operations. The Entity has completed a social stability assessment that involved the engagement of local authorities and Local Communities for the operation of all current plants.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity as the assessment reports identified no Indigenous Peoples within the Entity's Area of Influence. Additionally, there have been no New Projects or Major Changes since becoming an ASI Member in 2019.</p>

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has established and implemented a Procedure to identify cultural and sacred heritage and conduct risk assessments to reduce the impact on any such sites. The Entity has undergone an EIA and social stability assessment, and it has been determined that there are no sacred or cultural heritage sites or values within its Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as no cultural or sacred heritage has been identified within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects causing resettlement since the Entity commenced operations.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity has established and implemented a Stakeholder engagement process to identify the major concerns of Affected Populations and Organisations. The Entity has developed various plans to respond to the major concerns of the Affected Populations and Organisations. These plans include providing support for Local Community development, hiring employees from Local Communities (currently 98% of the workforce), providing employment opportunities to disabled Workers, and the establishment of a Social Assistance Foundation by the Entity's owner in 2020. The implementation and progress of the plans are reviewed annually, relevant improvement actions are taken and the Entity's or Group's actions and performance against the plans are publicly disclosed in the Group level ESG report which is accessible at:</p> <p>http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF</p> <p>However, the Plans to manage impacts to Local Communities have not been disclosed.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity's ASI Management Manual provides a commitment to not use minerals from Conflict-Affected and High-Risk Areas (CAHRAs) and has implemented a relevant Management System. Training has been provided for all relevant employees, and the Policy and requirements are disclosed in the Entity's Sustainability Report:</p> <p>http://www.stnm.com.cn/uploads/tinymce/images/ffa3781287601b0bab0f01ccfe1741d466fa6661d7852.pdf</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has identified and assessed the risks in its supply chain through regular reviews. No minerals or materials are sourced from CAHRAs, and there are no critical Human Rights issues such as Child Labour or Forced Labour identified.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity's risk assessment determined that no minerals or materials are sourced from CAHRAs and there are no 'red flags' in the supply chain. The Entity has designed and implemented sourcing strategies to address any identified risks. The Entity maintains a business relationship with material Suppliers to identify and respond to risks that may emerge in future.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Performance Standard Audit.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	<p>The Entity has established and implemented a Supplier Management Procedure, performed a risk assessment and undertaken a social responsibility audit on its supply chain. The Entity commits that no minerals or materials sourced from CAHRAs will be used in its supply chain, which has been confirmed based on the Entity's Due Diligence reports. The Entity has disclosed their Supplier management approach on page 34-35 of their Group level ESG Report which is accessible at: http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF</p> <p>However, the Entity has not disclosed information relating to their annual Due Diligence practices on conflict minerals risk.</p>
9.9 Security practice	Conformance	The Entity has established an ASI Manual and Security Management Procedure to respect Human Rights in security services. All security staff are trained on the Human Rights Policy and Procedure, which addresses Harassment, abuse and Forced Labour.
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 it complies with the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union. The Labour Union Constitution outlines the Union representative election process and Workers rights. The Entity's senior management has committed to respect the rights of Workers. Representatives are freely elected by Workers.
10.2a-c Child Labour	Conformance	The Entity has an adequate and effective process to ensure no Child Labour is used. Through document review, site observations and Worker interviews the Audit confirmed that there is no Child Labour occurring at the Entity. The youngest Worker is at least 18 years old.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy on the prohibition of Forced Labour including Human Trafficking. The Entity commits itself and expects its Suppliers to comply with the prohibition of Forced Labour, Modern Slavery and Human Trafficking. No case of illegal wage deductions, Debt Bondage, or other indications of Forced Labour has been identified nor reported at the Entity. The Entity has disclosed a Modern Slavery Statement, available at: http://www.stnm.com.cn/uploads/tinymce/images/e95d5a17326fa75d3a6f9253ebcaa75f677f18672391c.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established a commitment to non-Discrimination. The Entity's recruitment advertisements, training and promotion opportunities and termination records indicate decisions are solely based on the candidate's ability to perform the job requirements rather than other personal characteristics. The payment records demonstrate equal pay for the same work. Workers interviewed confirmed they feel they are treated equally.</p> <p>To date, no cases of Discrimination have been reported. Many Workers with disabilities are hired by the Entity, and the Entity has obtained an award as a 'Hebei Province Caring Enterprises' from the Hebei Provincial People's Government Working Committee on Disability. The Entity has disclosed their performance on gender equality in the</p>

CRITERION	RATING	COMMENT
		Group level ESG Report which is available at: http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System, and direct and frequent communication between the Entity's senior management, Workers and the representatives of the Worker Council is established. Worker interviews indicated a positive working environment with direct communication. Workers can report any concerns through various channels including a suggestion box, email, and a hotline including an anonymous channel. 'Whistleblowers' are not threatened with retaliation, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies stating that Harassment and bullying is not accepted. An information brochure has been developed and distributed to all employees. The Entity's Policy on Violence and Harassment is available at: http://www.stnm.com.cn/uploads/tinymce/images/c968da9e3f3b67c9eb0a5f743f59d28677f181f87d77.pdf
10.7a-c Remuneration	Conformance	The Entity and Workers sign labour contracts within a month of commencing employment at the Entity. The terms and conditions of the Labour contract meet the requirements of Applicable Law. The Entity's wage structure is clearly defined, and the basic wage is not less than the legal minimum wage. The total payment meets the Workers' basic needs. Overtime is paid in accordance with the legal requirements of 150% of the regular wage for Overtime on working days, 200% for weekends, and 300% on public holidays. All Workers are enrolled in the social insurance and housing fund. Moreover, all social insurance fees and housing fund fees for all Workers with disabilities are paid by the Entity, which is considered as leading practice in China. Wages are paid to Workers in a timely manner.
10.8a-c Working Time	Conformance	The Entity has established a Working Hour Control Procedure and working hours are recorded and tracked. The regular working hours are eight hours a day, five days a week for a total of 40 hours a week. Working hours are monitored and controlled, and the monthly Overtime working hours do not exceed the legal monthly limit. All Workers have greater than an average of one day off per seven-day working period.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through orientation training, providing an Employee Handbook, billboards on-site, and periodical communication.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System. The Entity has obtained ISO45001:2018 certification. A senior manager has been nominated with responsibility for the OH&S Management System. An identification and assessment process for OH&S risks and the establishment of actions and controls are documented and process is conducted in a joint effort with Workers and their representatives and management. No major OH&S risks were observed during the Audit.

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity regularly reviews the OH&S Management System, including during monthly safety meetings, annual legal compliance evaluations, annual internal audits against ISO 45001:2018 and periodic management review meetings. When an indication of a control gap is identified, a review is conducted to assess what preventive actions should be implemented.</p> <p>The achievement of OH&S objectives and targets and the comparative analyses of performance with peer businesses and leading practice are published on page 55 of the Group level ESG Report which is accessible at: http://www.lizhonggroup.com/uploads/ESG%E6%8A%A5%E5%91%8A/9d68bbd43f2f09680add5f642537f357.PDF</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a system of Workers' consultation and participation in Health & Safety in accordance with the requirements of ISO45001:2018. Workers are encouraged to report any concerns or advice on OH&S issues themselves or through Worker representatives. Management responds to the concerns and advice raised by Workers on OH&S issues.</p> <p>The Labour Union and Safety Committee annually investigate and analyse work safety accidents, formulate improvement measures, and ensure implementation. Employees at the shift level report weekly on potential OH&S hazards, and the Safety Committee identifies and implements corrective actions, preventive actions and verifies their effectiveness.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 December 2021	Initial Certification Audit – Full Certification
1	7 February 2024	Surveillance Audit
2	7 May 2025	<p>Re-Certification Audit and Scope Change – Full Certification</p> <p>Scope Change to apply PS V3.1, including title change for the supply chain activity 'Material Conversion'.</p> <p>Addition of supply chain activity 'Semi-Fabrication' to more accurately represent the Entity's activities</p>