# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# CSMET New Material Group Co., Ltd.



AUTHORISED BY

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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

CSMET New Material Group Co., Ltd. is located at 699 Zhenyan Road, Zhangyan Town, Jinshan District, Shanghai. The Entity produces Aluminium alloy ingots and Aluminium alloy liquid, with the main processes including feeding, melting, alloying, degassing, slag removal, ingot casting, and transportation.

# AUDIT REPORT PERFORMANCE STANDARD

## **OVERVIEW**

MEMBER NAME	CSMET Group Co. , Ltd.		
ENTITY NAME	CSMET New Material Group Co., Ltd.		
CERTIFICATION SCOPE	CSMET New Material Group Co., Ltd. is located at 699 Zhenyan Road, Zhangyan Town, Jinshan District, Shanghai. The Entity produces Aluminium alloy ingots and Aluminium alloy liquid, with the main processes including feeding, melting, alloying, degassing, slag removal, ingot casting, and transportation.		
SUPPLY CHAIN ACTIVITIES	<ul><li>Aluminium Re-Melting/Refining</li><li>Casthouses</li></ul>		
ASI STANDARD	Performance Standard V3		
AUDIT TYPE	Initial Certification Audit		
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.		
AUDIT DATE	• 28 – 29 November 2024		
AUDIT REPORT SUBMISSION	• 21 February 2025		
AUDIT SCOPE	The Audit Scope included the production of Aluminium alloy ingots and Aluminium alloy liquid, and the main processes include feeding, melting, alloying, degassing, slag removal, ingot casting, and transportation.		
	<ul> <li>Supply chain activities included in the Audit Scope:</li> <li>Aluminium Re-Melting/Refining</li> <li>Casthouses</li> </ul>		
	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.		
AUDIT OUTCOME	Certification		
AUDIT METHODOLOGY DECLARATION	<ul> <li>The Auditors confirm that:</li> <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 for the Audit, traceable and unambiguous.</li> <li>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.</li> <li>The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>		

CERTIFICATION PERIOD	27 May 2025 – 26 May 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	26 November 2026
CERTIFICATE NUMBER	451
	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**

CSMET New Material Group Co., Ltd. ('the Entity') was established in 2012 and is located at 699 Zhenyan Road, Zhangyan Town, Jinshan District, Shanghai. The Entity primarily produces Aluminium alloy ingots and Aluminium alloy liquid for domestic component die-casting factories and host factories. The main production processes and activities include feeding, melting, alloying, degassing, slag removal, ingot casting, and transportation. Current production capacity is approximately 70,000 tonnes. The Entity currently employs approximately 170 Workers, including over 40 women Workers. The Entity operates in the Zhangyan Industrial Zone.

## **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.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Low	MEDIUM
OVERALL		MED	IUM	

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a Compliance Evaluation Procedure. The Entity's Management Centre is responsible for regularly coordinating with various departments to evaluate their Compliance with Applicable Laws, regulations, and other requirements and then provides a summary of the evaluation results.
1.2 Anti-Corruption	Conformance	The Entity has established a Business Ethics Control Procedure and an Anti-Corruption and Anti-Bribery Control Procedure, which stipulate the Entity's requirements when communicating with the government, suppliers, and customers. The Entity has established an anti- Corruption inspection team led by the Chairman, and Department Managers participate in the monitoring team. The Entity has established a Clean Management Procedure which stipulates that employees cannot receive food or gifts beyond nominated values. The Entity has documented records of training management personnel on business ethics. The Entity has formalised integrity notices and commitment letters with suppliers and clients.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, which covers Environmental, Governance and Social (ESG) aspects. The Code has been endorsed by the General Manager and is reviewed annually. The Code of Conduct is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/28.html
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established an ESG Policy and elaborated on its content. The Entity stipulates that a re-evaluation of the Policy shall be conducted once every five years, or when deficiencies are identified in the Policy. The Policy has been appropriately displayed and communicated internally. The ESG Policy is publicly disclosed at: http://www.csmet.com.cn/news/newsdetail/id/27.html
2.2a-c Leadership	Conformance	The Entity appointed the Management Centre Manager as the Management Representative who is responsible for establishing the Entity's ASI Policy and implementing, maintaining, and improving the ASI Performance Standard (PS) Management System. The Management Representative provides human, financial, and material resources for the implementation of the ASI PS Management System.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity holds an ISO 14001:2015 certificate for their Environmental Management System, has an Environmental Management Manual and related management procedures including the Environmental Factor Identification, the Evaluation, Emergency Preparedness and Response, Environmental Testing and Measurement Procedures.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity holds an ISO 45001:2018 certificate and has established a Social Responsibility Management Manual and Labour management procedures on areas including anti-Discrimination and Harassment, prohibition of Forced Labour, protection of children and underage Workers, special protection for female employees, working hours and

CRITERION	RATING	COMMENT
		overtime guidelines and the prevention of punitive measures among others.
2.4a-e Responsible Sourcing	Minor Non- Conformance	The Entity has established a Responsible Purchasing Policy that addresses Aluminium sourcing, integrity, respect for Human Rights, non-support for conflict or high-risk minerals, attention to environmental protection, and concern for the interests of relevant parties. The Entity stipulates that the policy shall be re-evaluated within a maximum of five years or when there are deficiencies identified. The Entity established a Risk Due Diligence Control Procedure, requiring the Purchasing and Quality Departments to conduct risk investigations. The Entity has documented risk assessment records and has evaluated Human Rights and Environmental conditions for four suppliers. Responsible Sourcing forms part of the Entity's ASI Policy which is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/27.html During the Audit however, the Entity could not provide Due Diligence records for other suppliers.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as it has no current or planned New Projects or Major Changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as it has no current or planned New Projects or Major Changes.
2.7a-f Emergency Response Plan	Conformance	The Entity has a comprehensive Emergency Response Plan for Production Safety Accidents and an Environmental Incident Emergency Plan, both of which are filed with the local government. The Entity has established an Emergency Rescue Command System with defined responsibilities. The Emergency Response Plans include scenarios such as fire, natural gas leakage, gas outage accidents, equipment failures, Aluminium liquid transportation and insulation furnace failures. Emergency Response Plans for specific scenarios are disclosed on the Entity's website. Refer to:
		Emergency Plan for Sudden Environmental Events: http://www.csmet.com.cn/news/newsdetail/id/57.html
		Emergency Plan and Hazardous Waste Treatment Emergency Plan: http://www.csmet.com.cn/news/newsdetail/id/58.html
		Emergency Plan for Aluminium Ingot and Liquid Aluminium Production: http://www.csmet.com.cn/news/newsdetail/id/47.html
		The records of registration of the Emergency Response Plans with the government are disclosed at: http://www.csmet.com.cn/news/newsdetail/id/42.html http://www.csmet.com.cn/news/newsdetail/id/48.html
2.8a-d Suspended Operations	Conformance	The Entity has established a Regulations on the Management of Suspension and Resumption of Operations Procedure, which requires consideration of environmental, social, economic and governance factors during any suspension period and consideration of the impact on relevant stakeholders. The Entity's management regulations also require an evaluation to be conducted in the event of identification of deficiencies or every five years.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Regulations on Mergers and Acquisitions Management Procedure, and in the event of any merger or acquisition event, an ESG due diligence team will be established to conduct due diligence and issue an ESG investigation report. The Entity currently has no plans for mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Regulations on the Management of Closure, Retirement and Withdrawal Procedure, which requires consideration of environmental, social, economic, and governance factors during any closure, retirement or withdrawal stages as well as the consideration of the impact to relevant stakeholders. The regulation requires the Entity to provide financial support to restore environmental and social impacts.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has released its 2023 Sustainable Development Report, which includes policy positions and reports on performance of the implementation of environmental, social, and governance practices. The Sustainable Development Report has been disclosed at: http://www.csmet.com.cn/news/newsdetail/id/31.html
3.2 Non-compliance and Liabilities	Conformance	The Entity's Sustainable Development Report confirms there have been no legal violations recorded in the reporting period. This was confirmed via a check of public records during the Audit.
3.3a-c Payments to Governments	Conformance	The Entity prepared a Financial Audit Report for the 2023 reporting period. In the Sustainable Development Report, the Entity has disclosed the taxes and social security funds paid to government and confirmed that there were no further government payments or donations. The Sustainable Development Report is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/31.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established the Employee Complaint Handling Procedure. Employees can provide feedback through suggestion boxes, phone calls, or DingTalk. The Management Centre is responsible for handling employee complaints. The Environmental Health and Safety (EHS) Department handles complaints from the government, surrounding factories, and Local Communities. The Purchasing Department is responsible for handling complaints from suppliers. The Sales Department is responsible for receiving customer feedback. The Entity has publicly disclosed their Stakeholder Complaints and Appeals Handling Procedures at: http://www.csmet.com.cn/news/newsdetail/id/61.html The contact information for reporting is accessible at:
		http://www.csmet.com.cn/contact/report.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non- Conformance	The Entity has developed a Life Cycle Assessment (LCA) report for one tonne of Aluminium alloy ingot on a 'cradle-to-gate' basis, including acidification, eutrophication, toxicity, land impact, climate impact, and other aspects. The Greenhouse Gas (GHG) data in the LCA report however are inconsistent with data in the Product carbon footprint report and in addition, there is no differentiation of data between the

CRITERION	RATING	COMMENT
		carbon footprint of Pre-Consumer and Post-Consumer Scrap, and uncertainty around the proportions of Primary and Secondary Aluminium.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed a LCA report for one tonne of Aluminium alloy ingot on a 'cradle-to-gate' basis, including acidification, eutrophication, toxicity, land impact, climate impact, and other aspects. The LCA report is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/44.html
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented an Aluminium Process Waste Management Strategy. The Waste predominantly consists of slag and surface suspensions from smelting. The Entity has established the Regulations on Remelting of Unqualified Products to recycle and utilise the non-conforming Products generated. A small amount of non- conforming Products generated in the workshop are directly put into the next furnace for use. The Aluminium ash is recycled using a vertical ash stir fry machine. The processed Aluminium ash generally contains less than five percent Aluminium and is treated as Hazardous Waste.
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	Minor Non- Conformance	The Entity has established a Waste Aluminium Recycling and Reuse Strategy and has established a target of using 90% waste Aluminium as the raw inflow Material. Secondary Aluminium is recycled from customers and obtained from domestic Recycled Aluminium suppliers. The Entity also assists customers in processing thousands of tonnes of Aluminium ash every year. The Entity's Waste Aluminium Recycling and Reuse Strategy is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/32.html
		The Waste Aluminium Recycling and Reuse Strategy provided by the Entity does not however distinguish between Pre-Consumer and Post- Consumer Scrap. The Strategy also does not contain plans and actions to increase Post-Consumer Aluminium Scrap recycling in the future.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non- Conformance	The Entity has accounted for its energy use for the 2023 reporting period. The Entity has further accounted for its total GHG emissions in 2023, covering Scope 1, 2 and 3 emissions. The Entity has disclosed its GHG Emissions Report at: http://www.csmet.com.cn/news/newsdetail/id/51.html Further GHG emissions data are disclosed in the Entity's Sustainable Development Report at: http://www.csmet.com.cn/news/newsdetail/id/31.html

CRITERION	RATING	COMMENT
		The Entity commissioned an independent Third Party to verify their carbon emission data and issue a Greenhouse Gas Inventory Verification Statement.
		During the Audit it was found that the data the Entity used in calculating their emissions was not updated in a timely manner and therefore outdated data was used. When calculating the carbon footprint of Products, the Entity did not distinguish between Pre- Consumer and Post-Consumer Aluminium content. The Entity's public reporting of GHG emissions data also did not fully disclose all relevant GHG emissions.
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-e GHG Emissions Reduction Plans	Minor Non- Conformance	The Entity has developed a GHG Emissions Reduction Plan that has set 2023 as the base year and has set a medium-term target for five consecutive years until 2028. The Plan includes specific target values and includes a specific emission reduction pathway that was formulated using the ASI Entity-level Pathways Method and Calculation Tool. The Entity has established requirements for an annual review of the GHG Emission Reduction Plan and further review when changes to the baseline or target values are required. The Entity has disclosed the GHG Emissions Reduction Plan on their website at: <a href="http://www.csmet.com.cn/news/newsdetail/id/51.html">http://www.csmet.com.cn/news/newsdetail/id/51.html</a> The indirect emissions included in the GHG Emissions Reduction Plan does not differentiate between Scope 2 and Scope 3 emissions
		however, and the Plan does not quantity the methods or processes to achieve the emissions reductions proposed.
5.4 GHG Emissions Management	Minor Non- Conformance	The Entity has established a GHG Accounting Management Procedure for continuous improvement of overall environmental performance, establishing specific working procedures which included data collection, calculation and analysis, reporting and review. An improvement and objectives management plan has been established, including the improvement and objectives management plan, regular data updates and performance evaluation.
		There were however multiple non-conformities identified in the Entity's GHG emissions accounting and reduction planning. Several deficiencies were also identified in the overall GHG management system.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Minor Non- Conformance	The Entity conducts quarterly testing of Emissions to Air pollutants as required under Applicable Law and has provided recent environmental test reports; these reports do not identify any exceedance of standard limits.

CRITERION	RATING	COMMENT
		In its 2024 Water and Air Pollution Reduction Plan, the Entity has released statistics on the actual emissions of air pollutants. The Plan is disclosed at: <u>http://www.csmet.com.cn/news/newsdetail/id/52.html</u>
		The Entity's 2024 Water and Air Pollution Reduction Plan does not establish substantive air pollutant emission reduction actions however and also lacks specific emission reduction targets and quantitative data.
6.2a-g Discharges to Water	Minor Non- Conformance	The Entity's main Discharge to Water is domestic sewage. There is no Discharge of production wastewater. The production wastewater is recycled in a closed environment. Regular replenishment of process water is required due to evaporative losses.
		The Entity has identified the main pollutants in their domestic sewage discharges and provided recent environmental test reports, none of which exceeded the standard limits.
		The Entity has disclosed its 2024 Water and Air Pollution Reduction Plan at: http://www.csmet.com.cn/news/newsdetail/id/52.html
		The 2024 Water and Air Pollution Reduction Plan however has insufficient quantitative data on water pollutant emissions, has not established substantive water pollutant emission reduction actions and also is deficient in specific emission reduction targets and quantitative data.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has developed an Environmental Emergency Risk Assessment Report which includes an assessment of the possible risk of Spills or Leakages. An Emergency Response Plan for environmental emergencies has been formulated that addresses Spills and Leakages, with the emergency drill is required to be organised at least annually. The Entity has conducted a breach risk assessment and formed a Breach Risk Assessment Report. The Entity has disclosed their Breach Assessment Report on their website at: http://www.csmet.com.cn/news/newsdetail/id/35.html
		The Entity has disclosed relevant Emergency Procedures on their website, including the Emergency Plan for Seepage and Leakage at: <a href="http://www.csmet.com.cn/news/newsdetail/id/66.html">http://www.csmet.com.cn/news/newsdetail/id/66.html</a>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has a process in place where it discloses on the official website if a Leakage incident occurs. The Entity's website states that no such Leakage has occurred, and the Audit did not identify any evidence of Leakage related environmental incidents.
		The Entity's Breach Assessment Report confirms that no such Spills or Leakages have occurred. The Report is disclosed at: http://www.csmet.com.cn/news/newsdetail/id/35.html
6.5a-c Waste Management and Reporting	Minor Non- Conformance	The Entity has disclosed the types of Hazardous Waste it produces and established a Hazardous Waste inventory. The Entity cooperates with qualified Hazardous Waste disposal suppliers and provided signed cooperation agreements and qualification certificates for these Hazardous Waste disposal suppliers. The Entity produces a statistical summary of the transfer volume of Hazardous Waste every month, with clear data records and treatment records. The Entity's Non-Hazardous solid waste is managed by a single third- party contractor. Records are maintained and were verified in the Audit.

CRITERION	RATING	COMMENT
		The Entity and the local regulatory department jointly use the environmental protection standardised management terminal system to control the physical Hazardous Waste movements, maintain records and maintains a 'real time' inventory balance.
		The Entity has disclosed their Summary of Waste Generation Report at: http://www.csmet.com.cn/news/newsdetail/id/52.html
		During the Audit, it was found that the Entity did not disclose their disposal methods of Hazardous and Non-Hazardous Wastes, did not assess the Material impacts on human well-being and the environment and did not fully develop their Waste management strategy.
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 commissioned a dedicated Hazardous Waste warehouse for the storing of Aluminium Dross. Special protective measures have been established to prevent Aluminium Dross from leaking to the environment. The Entity maintains specific data on the current inventory of Aluminium Dross.
		The Entity recovers the Aluminium in the Aluminium ash through three sets of processes. The remaining Aluminium Dross contains less than 0.5 percent Aluminium and is then stored as a Hazardous Waste.
		Depleted Dross is transferred to third party disposal companies which add synthetic materials to the Dross and heat treat to create solid materials which are used as a building material. In accordance with Applicable Law, the Entity does not landfill Aluminium ash slag.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's primary water use is for domestic water and cooling water. Cooling water requires small volumes, and the water is circulated in a closed loop environment. The Entity's total water use is a negligible volume of the output of the local water provider. The Entity has assessed the risk of groundwater withdrawal, municipal water withdrawal and sewage risk and demonstrated that the water related risk from their activities is low. The Entity has disclosed the Water Risk Assessment Report at: http://www.csmet.com.cn/news/newsdetail/id/36.html
		The Entity disclosed statistical records of water consumption on its website at: http://www.csmet.com.cn/news/newsdetail/id/52.html
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as the Entity's assessment of its water management related risks is low.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a comprehensive analysis of Biodiversity related risks considering the impact of environmental pollution and Alien organisms, the occurrence probability, degree of harm and risk level, and assessed that the Biodiversity risk in the area is 'low'.

CRITERION	RATING	COMMENT
		The Entity has disclosed the Biodiversity Risk Assessment at: http://www.csmet.com.cn/news/newsdetail/id/38.html
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 by the Entity in its Biodiversity Assessment Report are demonstrated to be Low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the risks and potential impacts identified by the Entity in its Biodiversity Assessment Report are demonstrated to be 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 by the Entity in its Biodiversity Assessment Report are demonstrated to be Low and no priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	In the Biodiversity Assessment Report, the Entity has assessed the risks from Alien Species, which are differentiated as intentionally introduced, unintentionally introduced and naturally introduced. The Entity has identified the possible risks and developed corresponding measures. At present, no Alien Species have been found in the vicinity of the Entity. The Entity actively cooperates as required with local government departments to prevent the invasion of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Sites in the vicinity of the Entity. The Entity has made a commitment to prohibit entry to any World Heritage Site, which has been formalised in a commitment letter.
8.6a-d Protected Areas	Conformance	There are no Protected Areas in the vicinity of the Entity and there are no environmentally sensitive objects in the area. The Entity has committed to implement appropriate control measures in the event of future site changes where there may be Protected Areas in the vicinity.
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	Minor Non- Conformance	The Entity has formulated their Respect for Human Rights Policy. The Entity will review this Policy every five years, or when deficiencies are identified. The Entity has established a Human Rights Investigation Control Procedure and developed a Human Rights Due Diligence report. No violations of Human Rights have been identified. The Entity provided an assessment and related response measures for any Affected Population and organisations. The Entity however did not appropriately map all Affected Populations and Organisations. The Respect for Human Rights Policy is accessible at: http://www.csmet.com.cn/news/newsdetail/id/40.html

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed a Gender Equality Project Implementation Plan and has committed to maintain gender equality in work, promotion, training and management activities. The Plan is reviewed every five years, or when there are deficiencies identified. The Entity has also developed a Women's Protection Management Procedure, Risk Assessment Procedure for New Mothers and Pregnant Women, and Special Protection Management Procedure for Female Employees, to ensure the rights and interests of female employees. There are currently 21 percent female employees in the Entity's workforce, and 31 percent of management positions in finance, administration, and business centres are presently female. The Entity's Gender Equality Project Implementation Plan is disclosed at: http://www.csmet.com.cn/news/99.html
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.
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 in the Entity's Area of Influence.
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 in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence, and there are no cultural heritage sites or religious holy sites in the vicinity. The nearest identified religious sites are greater than ten kilometres away.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as there is no current or planned displacement. There are no current Major Changes or New Projects.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has documented its impacts on the Local Community. The Entity's employees are from Local Communities but form a small portion of the total Local Population. The Entity evaluated their own activities and concluded there is not a negative impact on the surrounding Population and organisations. The Entity's Manager is actively involved in the administration of the nearest village and participates in activities to support rural development. The Entity's Assessment of Affected Populations and Organisations and response measures report is available at: http://www.csmet.com.cn/news/newsdetail/id/41.html

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has implemented a Due Diligence Control Procedure, Conflict Mineral Management Regulation and Supply Chain Procurement Policy, which are all incorporated into the Entity's existing management system.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity's Supplier Due Diligence Report identifies that 90 percent of raw Materials used by the Entity are Recycled Aluminium from domestic suppliers. The remaining portion of Primary Aluminium is sourced from domestic Aluminium Smelters. The Entity's assessment concludes that all suppliers are low risk. The Entity has a process to conduct an annual survey of suppliers to identify whether the Aluminium inflows are sourced from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's Supplier Due Diligence Report identifies that 90 percent of raw Materials used by the Entity are Recycled Aluminium from domestic suppliers. The remaining portion of Primary Aluminium is sourced from domestic Aluminium Smelters. The Entity's assessment concludes that all suppliers are low risk.
		The Entity has implemented the Conflict Mineral Management Procedure for Investigation which stipulates that if there is a risk identified in the Aluminium supply chain the supplier is required to provide a written analysis and immediately cease purchasing and using Aluminium from sources with Materials with risks and provide valid supporting evidence. Suppliers are also required to develop corresponding improvement and preventive measures to control risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Purchasing Department conducts on-site audits of the Primary Aluminium suppliers. No Primary Aluminium is not sourced from CAHRAS. The Entity's Due Diligence was further audited as part of this ASI Performance Standard Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has documented their Supplier Investigation Report, completed the supplier evaluation for 2023 and conducted on-site investigations of two Primary Aluminium suppliers. The results of the Due Diligence are disclosed in the Entity's Sustainable Development Report: <u>http://www.csmet.com.cn/news/newsdetail/id/31.html</u>
9.9 Security practice	Conformance	The Entity has contracted security services to a third-party security company. The Entity has established the Security Management Regulation which governs the conduct of security personnel.
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 developed documents affirming the rights of Workers to associate freely, bargain collectively and clarifies the rights of employees to voluntarily choose whether to join the Trade Union, within the scope of Applicable Law. The Entity implements an employee representative system to elect employee representatives who are mainly responsible for assisting employees in dealing with

CRITERION	RATING	COMMENT
		issues such as complaints, Discrimination, unfair treatment, safety, environment and welfare.
10.2a-c Child Labour	Conformance	The Entity has established a Policy that explicitly prohibits the use of Child Labour and sets out requirements for the protection of underage Workers. The youngest Workers currently employed by the Entity are at least 22 years of age. No instances of Child Labour were identified in the Audit, which was confirmed in Worker interviews.
10.3a-c Forced Labour	Conformance	The Entity has established a regulatory document for the prohibition of Forced Labour which protects the rights of employees. Through the on-site Audit and interviews, there were no incidents of Forced Labour or Modern Slavery identified. The Entity has developed a Statement against Modern Slavery which has been disclosed at: http://www.csmet.com.cn/news/newsdetail/id/65.html
10.4a-c Non-Discrimination	Conformance	The Entity has formulated the Anti-Discrimination and Harassment Management Procedure which clarifies the requirements for the prohibition of Discrimination and processes to treat employees equally in the course of their work. Through interviews, it was learned that the working environment and human environment of the Entity is positive, and no instances of Discrimination were identified.
10.5 Communication and engagement	Conformance	The Entity has established documents to clarify the internal and external information transmission and communication methods and established methods to facilitate employee communication through contact numbers, mailboxes and suggestion boxes. The Entity publishes the contact information of management representatives to facilitate communication with Workers. Through interviews, it was identified that employees are aware of these methods and were not concerned about retaliation when raising concerns.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Policy to eliminate Violence and Harassment. The Policy clearly states that any form of Violence or Harassment in the workplace is prohibited. The Policy document is posted in both the factory and public areas of the Entity so that Workers can easily understand and familiarise themselves with the Policy. Worker interviews did not identify any incidents of Violence or Harassment in the Entity. The Entity's current Policy is newly developed, and the Entity has plans to review the Policy on an annual basis.
10.7a-c Remuneration	Conformance	The Entity and its Workers sign employment contracts at the recruitment stage which specifies the basic information of remuneration and the terms and conditions of employment. The employment contracts are in conformance with Applicable Law. The wages paid by the Entity are higher than the local minimum wage. The Entity provides overtime pay in accordance with statutory requirements. A sample of wages were reviewed as part of the Audit, which clearly demonstrated that the overtime wages paid by the Entity comply with Applicable Law. The Entity's pays Workers via electronic transfer, which is in accordance with local payroll regulations.
10.8a-c Working Time	Minor Non- Conformance	The Entity has formulated a working hours system that establishes shift times in accordance with statutory requirements.

CRITERION	RATING	COMMENT		
		The Audit identified that the overtime hours of the Entity's frontline employees however exceeded the statutory maximum of 36 hours per month. In addition, the method used by the Entity to calculate paid annual leave does not comply with the relevant regulations.		
10.9a-b Informing Workers of Rights	Conformance	The Entity has established a document on Freedom of Association and The Right to Collective Bargaining clarifying the rights and interests of Workers. The Entity communicates this Policy commitment to all Workers. The Entity implements a representative system, where Worker representatives are elected from among 'frontline' employees and who assist Workers in managing individual matters related to their interests. The Audit identified that Workers are aware of their rights and are comfortable to exercise these rights.		
11. OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management Policy and System. The Entity holds a valid ISO 45001:2018 Certificate. The Entity has established an OH&S management manual and management procedures including hazard identification, evaluation and management, emergency preparedness and response, accident management, safety performance monitoring and measurement and other management procedures.		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity conducts an annual management review and internal audit of the OH&S Management System to evaluate the suitability of policy and the achievement of target indicators. The Entity conducts annual occupational disease hazard factor testing and occupational disease physical examination. The Entity has compared its indicators of personal injury, fire, equipment and accident rates with peer businesses. The Entity has disclosed their OH&S performance at: http://www.csmet.com.cn/news/newsdetail/id/55.html		
11.2 Employee engagement on Health and Safety	Conformance	The OH&S Management Manual requires non-management Workers to participate in Health and Safety affairs. The Entity has established an OH&S Committee which includes Worker representatives.		

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	27 May 2025	Initial Certification Audit – Full Certification