# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Gränges Aluminium (Shanghai) Co., Ltd.



AUTHORISED BY

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**

Manufacture of Aluminium foils, strips, sheets, and folded tubes at Gränges Aluminium (Shanghai) Co., Ltd., a subsidiary of Gränges Group, located in Jiading District, China.

# AUDIT REPORT PERFORMANCE STANDARD

# **OVERVIEW**

MEMBER NAME	Gränges Gränges Aluminium (Shanghai) Co., Ltd. Manufacture of Aluminium foils, strips, sheets, and folded tubes at Gränges Aluminium (Shanghai) Co., Ltd., a subsidiary of Gränges Group, located in Jiading District, China.			
ENTITY NAME				
CERTIFICATION SCOPE				
SUPPLY CHAIN ACTIVITIES	<ul><li>Casthouses</li><li>Semi-Fabrication</li></ul>			
ASI STANDARD	Performance Standard V3.1			
AUDIT TYPE	<ul> <li>Initial Certification Audit (10 – 11 June 2019)</li> <li>Surveillance Audit (13 – 15 January 2021)</li> <li>Re-Certification Audit (7 July – 8 July 2022)</li> <li>Surveillance Audit (8 – 10 January 2024)</li> <li>Re-Certification Audit and Scope Change (21 -23 April 2025)</li> </ul>			
AUDIT FIRM	DNV Business Assurance Services UK Ltd.			
AUDIT DATE	<ul> <li>10 - 11 June 2019 (Initial Certification Audit)</li> <li>13 - 15 January 2021 (Surveillance Audit)</li> <li>7 - 8 July 2022 (Re-Certification Audit)</li> <li>8 - 10 January 2024 (Surveillance Audit)</li> <li>21 -23 April 2025 (Re-Certification Audit and Scope Change)</li> </ul>			
AUDIT REPORT SUBMISSION	<ul> <li>19 June 2019 (Initial Certification Audit)</li> <li>9 March 2021 (Surveillance Audit)</li> <li>20 July 2022 (Re-Certification Audit)</li> <li>19 February 2024 (Surveillance Audit)</li> <li>Re-Certification Audit and Scope Change (3 June 2025)</li> </ul>			
AUDIT SCOPE	<ul> <li>Initial Certification Audit (10 – 11 June 2019)</li> <li>The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.</li> <li>Supply chain activities included in the Audit Scope:</li> <li>Casthouses</li> <li>Semi-Fabrication</li> <li>Material Conversion</li> <li>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</li> </ul>			

#### Surveillance Audit (13 – 15 January 2021)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Re-Certification Audit (7 – 8 July 2022)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Surveillance Audit (8 – 10 January 2024)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- 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 (21-23 April 2025)

The Audit Scope included Gränges Aluminium (Shanghai) Co., Ltd. a subsidiary of Gränges Group, located at No. 1111 Jiatang Highway, Jiading District, Shanghai, China.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:
	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	11 July 2025 – 10 July 2028

NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	10 January 2027
CERTIFICATE NUMBER	36
	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**

Gränges Aluminium (Shanghai) Co., Ltd. (the 'Entity') is located at 1111 Jiatang Road, Jiading District, Shanghai. It was registered and established with the Shanghai Municipal Administration for Industry and Commerce in September 1996. The Entity was constructed in two phases, with the first phase covering an area over 19 hectares (296 mu) and the second-phase expansion covering an additional 16 hectares (240 mu).

The Entity's main products are high-precision Aluminium heat transfer materials, with an annual designed production capacity of 120,000 tonnes of heat exchanger rolled Aluminium materials, 5,000 tonnes of battery foil, and 1,000 tonnes of folded tubes. The main production processes include remelting, ingot casting, composite processing, hot rolling, cold rolling, cutting, and packaging.

## **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	High	High	HIGH
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL		MED	IUM	

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a Policy and process for legal Compliance management to identify and evaluate Applicable Laws, regulations, and requirements related to its operational activities such as business operations, environment, health, safety, and labour. Compliance assessments are conducted annually.
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Policies and processes, including training to identify and prevent Corruption. The Entity works against Corruption in all its forms, including Extortion and Bribery, and is consistent with Applicable Law and prevailing international standards.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct with principles related to environmental, social and governance performance. The Entity has implemented measures that include training and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct is publicly disclosed in numerous languages on the website, and available at: https://www.granges.com/sustainability/governance-and- policies/policies
		https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/sustainability-policies- 2024/coc_2024_english.pdf
		The Code of Conduct is reviewed by senior management periodically.
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented systems, procedures and processes that address the Environmental, Social and Governance (ESG) Policy requirements. The Entity has senior management endorsement of its ESG-related Policies and demonstrates its commitment and support to the implemented Policies providing sufficient resources for regular review. The Entity makes its Policies available to internal and external Stakeholders through both internal training and via the website: https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/01local-policies/1-labor-and- business-ethics-policy.pdf Employees are provided training on the Policies and the relevant
		requirements. The Policy is reviewed in the annual management review meeting.
2.2a-c Leadership	Conformance	The Entity has nominated a Management Representative with the responsibility and authority for each department. Key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has identified and assessed social and Occupational Health and Safety (OH&S) impacts and established and implemented management provisions to prevent and/or mitigate these impacts. The Entity is certified against ISO 45001:2018.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and implemented a Responsible Sourcing Policy. The Policy and the requirements of the ASI Performance Standard are communicated to suppliers and contractors. The Entity has implemented a supply chain Due Diligence process. The Responsible Sourcing Policy is reviewed in the annual management review meeting. The Policy is publicly disclosed at: https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/sustainability-policies-2024/gp2.10- global-responsible-sourcing-policy-2024-02-22.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the past three years.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the past three years.
2.7a-f Emergency Response Plan	Conformance	The Entity maintains valid certifications for both ISO 14001:2015 and ISO 45001:2018 and has developed Emergency Response Plans in conjunction with potentially impacted Stakeholders including Local Communities, Workers and their representatives, and relevant agencies. These emergency response strategies address social, OH&S, and environmental incidents, and training is undertaken for all personnel. The Entity is committed to reviewing its Emergency Response Plans upon any changes that alter the nature or scale of risks or if control deficiencies are identified. The Plans are available at: https://www.granges.com/globalassets/04hallbarhet/06local-policies/asia/250514-2-gsh-emergency-plan.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a Business continuity plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which takes into account Material adverse environmental, social and governance impacts. The plan is reviewed during the annual management review meeting.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure for mergers and acquisitions, that requires a third party to conduct Due Diligence and review environmental, social and governance practices, related to this Standard, including those associated with Historic Aluminium Operations, in consultation with the Affected Populations and Organisations, and implementation of remedy measures to mitigate the identified impact.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for the planning processes for closure, decommissioning and divestment. There has been no closure, decommissioning or divestment activity in the past three years.
3. TRANSPARENCY		

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	The Entity, as part of the Gränges Group, has published its Annual and Sustainability Report 2024. The report covers key performance indicators for the Entity, including Human Rights, environmental health and safety, accident rates, interactions with the Local Community, and legal Compliance information as provided by the local environmental protection bureau. The Group Report is available at: https://www.granges.com/globalassets/05investerare/04 rapporter-och-presentationer/2025/02annual-report- 2024/granges-annual-and-sustainability-report-2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity received seven correction requests from government agencies or Non-Government Organisations (NGOs) in 2024, however, there were no significant fines or penalties raised. Three non-conformances are publicly disclosed on the relevant NGO's website. The Entity has since corrected all non-conformances, with details available at: https://www.granges.com/globalassets/04hallbarhet/06local-policies/asia/250514-4-action-plan-for-jiading-district-environment-bureau-on-site-check.pdf
3.3a-c Payments to Governments	Conformance	The Entity's payments to governments are only those legally required, such as tax, which are detailed in its Financial Audit Report and audited by a Third Party audit firm. The Entity has implemented its Anti-Corruption Policy, as confirmed by management. The independent Auditor's Report of the financial statements is publicly disclosed in the Annual and Sustainability Report, page 119: https://www.granges.com/globalassets/05investerare/04 rapporter-och-presentationer/2025/02annual-report- 2024/granges-annual-and-sustainability-report-2024.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented an internal and external Complaints Resolution Mechanisms (e.g., hotline, mail, suggestion box), including an independently operated 'whistleblower' function that can be accessed by employees, business partners and other Stakeholders. Further information is available at: https://www.granges.com/about-granges/corporate- governance/whistleblower
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LA) via a Third Party. The assessment covers all production lines and all Products are the same in nature. The LCA is 'cradle-to-gate', with the impacts of the various production stages and End of Life recycling assessed.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's LCA report is available upon request and for download at: https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/01local-policies/4-lifecycle- assessment-of-cladded-aluminium-strip-used-in-heat- exchanger.pdf Further information on the LCA is available on the Entity's website: https://mp.weixin.qq.com/s/fnsJsBdifQINQI98-2COCg
4.2 Product Design	Conformance	The Entity has developed and implemented a research and design procedure where environmental impacts are considered. Targets for

CRITERION	RATING	COMMENT
		energy consumption, waste reduction and recycling are defined for each Product in a Technical Confirmation Form.
4.3a-b Aluminium Process Scrap	Conformance	The Entity's Aluminium Process Scrap is collected and packaged, and the Scrap composite material is re-used. The re-use target for 2025 is 90%, with the remaining Scrap sold to the supplier for re-use. In 2024 the Entity re-used 80% of its Process Scrap.
		The Entity has established a classification rule for its Scrap and the site observation during the Audit confirmed that Process Scrap is identified based on the concentration of the chemical elements and stored separately for recycling.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	In China, there are no complete local, regional, or national collection and recycling systems for Aluminium Scrap. As a result, the Entity collaborates with customers to increase recycling rates. The Entity uses commercial scrap collectors.
5. GREENHOUSE GAS EMISSI	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	In alignment with the ISO 14064 standard and the 'Guidelines for Accounting and Reporting Greenhouse Gas Emissions in the Nonferrous Metal Industry in Shanghai', the Entity has conducted a comprehensive inventory of its energy consumption and Greenhouse Gas (GHG) emissions at the organisational level. A Third Party verification of the emissions data was performed. The Entity's GHG Emissions Report, which includes Scope 1, Scope 2, and Scope 3 Category 1 GHG emissions, is available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-6-gsh-2024-ghg-brief-report.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan and used the ASI GHG Pathways Calculation Tool to establish its GHG Emissions Reduction Pathway and formulate its medium and long-term reduction plans. This approach ensures that the Entity's GHG Emissions Reduction Pathway is consistent with a 1.5°C warming scenario.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non- Conformance	The Entity has established a GHG Emissions Reduction Pathway using the ASI method and includes 2024 as the baseline year. Intermediate

CRITERION	RATING	COMMENT
		Targets have been established for reducing emissions intensity, including Scopes 1 and 2 and Scope 3 Category 1 emissions.
		To achieve these targets, the Entity has implemented or plans to adopt technological and managerial measures, such as improving energy efficiency, optimising processes to reduce energy consumption, and sourcing 'low-CPF (Carbon Footprint)' raw materials. Detailed objectives and strategies for 2025-2029 are outlined in the publicly disclosed 2023-2030 GHG Emissions Reduction Action Plan, available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-8-gsh-reduction-program.pdf
		The Entity is committed to annually reviewing the progress of its GHG Emissions Reduction Plan and disclosing updates and improvement measures to achieve its GHG reduction targets.
		However, the publicly disclosed GHG Emissions Reduction Plan does not include the annual quantified reduction targets to 2029 nor the Entity's progress or performance to date.
5.4 GHG Emissions Management	Conformance	The Entity has developed a GHG Emissions Reduction Plan that outlines its management strategies, with a primary focus on energy management. Through site observations, document reviews, and interviews, it was confirmed that the Entity follows the Plan-Do-Check- Act (PDCA) methodology to manage energy consumption and monitor the performance of its Management System to ensure the successful implementation of the GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has developed and implemented an Air Emissions Management Plan which includes actions and controls to mitigate adverse impacts. Emissions to Air are collected and treated prior to discharge. The Entity's monitoring reports for 2023 and 2024 confirm that emissions meet the local emission standards. The Entity publicly discloses air emissions data annually in the Air Pollutant Emissions Reduction Control Plan, available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-9-gsh-air-pollutant-emission-reduction- control-plan.pdf
6.2a-g Discharges to Water	Conformance	The Entity has established water reduction targets and implemented a comprehensive plan to mitigate adverse environmental impacts. The Entity has a single water discharge source for sanitary wastewater, there is no wastewater from production processes. Wastewater discharges are effectively managed under its Environmental Management System. Monitoring reports for 2023 and 2024 confirm that all major pollutants are within the local legal discharge limits. Additionally, the Entity has publicly disclosed its Wastewater Reduction Plan, available at: https://www.granges.com/globalassets/04hallbarhet/06local-policies/asia/250514-10-gsh-water-saving-action.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a procedure to assess and manage risks related to Spills and Leakages of pollutants, supported by appropriate emergency response actions and plans. Regular checks are conducted to detect potential sources of Spills or Leakages. The Entity commits to updating its emergency response and prevention

CRITERION	RATING	COMMENT
		management plans in response to company changes that may affect risk levels or if control weaknesses are identified. The Entity's Emergency Response Plan is available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-2-gsh-emergency-plan.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established and implemented an information disclosure procedure related to Spills and Leakages reporting. Since 2019, no Spill or Leakage incidents have occurred.
6.5a-c Waste Management and Reporting	Conformance	Waste management is integrated into the Entity's Environmental Management System, guided by the Waste Mitigation Hierarchy. The Entity prioritises waste reduction through re-use and recycling strategies, effectively decreasing the amount of waste generated, particularly Hazardous Waste, per unit of Product. Hazardous Waste disposal complies with all applicable legal requirements. The Entity publicly discloses the quantities of Hazardous and Non-Hazardous Waste generated from its activities in 2024 on the government website for 'Corporate Environmental Information Legal Disclosure System': https://e2.sthj.sh.gov.cn/jsp/view/hjpl/index.jsp
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 comprehensive management process to optimise Aluminium Dross collection and utilisation, aiming to reduce Aluminium content in the Dross and improve resource efficiency. Dross generated during production is transferred to government-approved recycling companies, where it is processed into building materials, purifying agents, and other valuable products, avoiding landfilling. Annual on-site inspections of these companies ensure compliance with environmental standards. Additionally, the Entity has developed a strategic plan to further reduce Aluminium content in unprocessed Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has measured and documented its water intake and usage by source and type as part of its environmental impact and water resource risk assessments. It has evaluated water-related risks, considering local water environments, intake and discharge levels, and the effectiveness of existing management measures. The assessments indicate a low water resource risk, with no significant water-related risks identified within the Entity's Area of Influence. The Entity's Status of Water Use and Risk Assessment of Water Resources Report is publicly available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-13-gsh-water-resource-risk.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as it has identified there are no significant water-related risks in its Area of Influence. It holds a valid ISO 14001:2015 certificate and follows local legal requirements. The

CRITERION	RATING	COMMENT
		control measures for wastewater discharge are established and implemented.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	As part of its Environmental Management System, the Entity has conducted a Biodiversity assessment to evaluate potential impacts on Biodiversity and Ecosystem Services. The Entity is not situated in or near any Protected Areas, and its operations have been assessed, posing very low risks and impacts on Biodiversity and Ecosystem Services. The Entity's Biodiversity Risk Assessment is publicly available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-14-biodiversity-risk-assessment.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the approved Environmental Impact Assessment determined that the risks and potential impacts are low. Furthermore, no Priority Ecosystem Services were identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the approved Environmental Impact Assessment determined that the risks and potential impacts are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has established a Management Policy and procedures to prevent the introduction of invasive species. Potential risks from its operations and logistics activities have been identified and assessed for their impact on Biodiversity and Ecosystem Services. Based on the biodiversity assessment, the risk of the Entity's activities introducing Alien Species was deemed low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's management manual includes a clear commitment not to explore, develop New Projects, or implement Major Changes within World Heritage Properties. Additionally, there are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity's management manual outlines its commitment to environmental protection. According to the Environmental Impact Assessment Report, which has been approved by the local Environmental Protection Agency (EPA), there are no Protected Areas within the Entity's Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established the ASI Policy, which includes a gender- responsive commitment to respect Human Rights. The Entity has established and implemented a Human Rights Due Diligence process,

CRITERION	RATING	COMMENT
		which included mapping Affected Populations and Organisations, and in consultation with them, undertook a risk assessment to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Policy commitment and the Human Rights Due Diligence process are reviewed in the annual management review meeting. No further action is needed. The Policy is publicly disclosed at: https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/01local-policies/1-labor-and- business-ethics-policy.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity commits to respect women's rights and implements a program to promote gender equity and women's empowerment throughout the employment period. The program and its effectiveness are reviewed in the annual management review meeting. The report on the effectiveness of the measures taken to promote gender equity is publicly disclosed at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-15-gsh-promoting-gender-equality-and- womens-empowerment.pdf
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 no cultural or sacred heritage sites or values are in the Entity's 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 sites or values are in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlement has occurred since the Entity commenced operations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is located in an industry zone, surrounded by other factories with no adjacent residential communities. Based on the result of risk assessment, environmental issues are the primary adverse impact on Local Communities. As such, the Entity established an Emergency Response Plan for environment incidents in consultation with the identified Affected Populations and Organisations.
		The Entity employs members of the Local Communities to support their livelihoods.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a Policy and management procedure for Conflict-Affected and High-Risk Areas (CAHRAs). The relevant responsibilities and authorities are clearly defined. This Policy is communicated to the Entity's suppliers and customers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity established and implemented a Due Diligence process, including supply chain mapping and the relevant risk assessment. The locations of Bauxite origin or transit have been identified. No 'red flags' have been identified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The strategy to respond to identified risks are defined following the OECD Guidance. Per the outcome of the supply chain mapping and the relevant risk assessment, no red flags in the Entity's supply chain are identified, and no further actions are taken.
9.8d Conflict-Affected and High-Risk Areas - Audit of	Conformance	The Entity conducts internal audits against the ASI Performance Standard as part of its Due Diligence process.
due diligence		Additionally, the Entity's Due Diligence practices were audited as part of this ASI Re-Certification Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reviews the supply chain Due Diligence process and the performance achieved, and reports to the head office. Relevant information is disclosed in the Supply Chain Due Diligence Report available at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-16-gsh-supply-chain-due-diligence-report- gsh.pdf
9.9 Security practice	Conformance	The Entity has implemented a service agreement with the security company regarding the labour contracts of security Workers, which clearly defines the primary role of security Workers is to protect people, property and assets, and to respect Human Rights.
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 Applicable Law in China regarding the Freedom of Association and right to Collective Bargaining.
		There is a Trade Union with five freely elected Committee members. All employees are free to join the Trade Union. A Collective Bargaining agreement is in place at the Entity and is reviewed and renewed annually.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	There is a Trade Union present at the Entity and the Committee members are freely elected. Committee members can deal with Workers' concerns with management on their behalf. A Collective Bargaining agreement is in place at the Entity and the agreement is reviewed annually.
10.2a-c Child Labour	Conformance	The Entity has developed and implemented a Policy prohibiting the use of Child Labour. There is no presence of Child Labour or young Workers identified at the Entity. Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection under the law and are not allowed to work in hazardous working conditions. The youngest Worker at the Entity is 21 years The Entity commits itself and

CRITERION	RATING	COMMENT
		communicates with its suppliers to comply with the prohibition of Child Labour.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy for the prohibition of Forced Labour, slavery and Human Trafficking. The Entity does not engage in nor support Forced Labour. All employees are directly hired and are not required to pay any form of fees or deposits. There is no presence of foreign Migrant Workers employed by the Entity, all Workers are Chinese nationals. The Entity does not restrict Workers' freedom of movement to and from the site. The Entity does not retain the original documents of Workers, only copies of original documents are kept in Workers' files. The Entity does not deny Workers the freedom to terminate their employment with the prior notice in line with labour contract law. The Entity's annual Modern Slavery Statement is publicly disclosed at: https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-17-gsh-anti-slavery-and-human-trafficking-
		statement.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. Decisions in hiring, employment (such as compensation, promotion, access to training, etc.), or the termination of Workers are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics. Relevant training courses are provided to all employees. No cases of Discrimination have been reported.
10.5 Communication and engagement	Conformance	The Entity has implemented operating procedures to ensure open communication and direct engagement with Workers regarding working conditions and the resolution of workplace and compensation issues without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Policy on the prohibition of Violence and Harassment in the workplace and has communicated this to all Workers. As part of the hazards identification and risk assessment process in OH&S management, with the participation of Workers and their representatives, the Entity identifies and assesses the risks of Violence and Harassment, and establishes control measures to control the risks. The Policy on Violence and Harassment in the workplace is reviewed in the annual management review meeting. No complaints regarding Violence or Harassment have been received in the past three years. The ASI Policies, including the Policy on Violence and Harassment is publicly disclosed at: https://www.granges.com/globalassets/04hallbarhet/02strategy- and-governance/08policies/01local-policies/1-labor-and- business-ethics-policy.pdf
10.7a-c Remuneration	Conformance	All Workers sign an employment contract within the month of joining the Entity. The terms and conditions of employment in the contracts comply with the applicable legal requirements. The local legal minimum wage is guaranteed, however, there is no formal living wage or industry minimum standard in the region. The wage of Workers is sufficient to meet the basic needs of Workers and to provide some discretionary income.

CRITERION	RATING	COMMENT		
		The Entity compensates Overtime hours in line with the applicable legal requirements. The wages are paid to Workers timely, in legal currency and a wage slip is provided with all required information.		
10.8a-c Working Time	Minor Non- Conformance	The Entity has developed a management procedure covering working hours, Overtime work and the control of Overtime. Working hours are recorded and monitored. However, for two of the 25 sampled Working Time records of Workers reviewed during the Audit, the monthly Overtime hours exceeded the legal limit of 36 hours/month, including one example of 50 hours during December 2024. Additionally, it was identified that one Worker was not granted one day off for every seven days, having worked 12 consecutive days without a day off.		
10.9a-b Informing Workers of Rights	Conformance	The Entity has implemented a communication procedure and information about the Workers' rights is communicated to Workers through multi-channels, such as the employee manual, on billboards in workshop and canteen areas, and during meetings between the Union and the Entity.		
11. OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and continuously improved its ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System. On-site observations, document reviews, and interviews with management and Workers confirmed the effectiveness of the system in preventing workplace hazards, promoting a safe and healthy work environment, and ensuring compliance with relevant regulations and standards.		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity conducts systematic reviews of its OH&S Management System to ensure continuous improvement and effectiveness. These reviews include monthly safety meetings, annual legal compliance checks, internal audits aligned with ISO 45001:2018 standards, and management reviews. Identified control gaps are promptly addressed with corrective or preventive actions. The Entity has published its OH&S objectives, 2024 targets and a performance analysis compared with industry peers in its annual Safety Performance Report, available at:		
		https://www.granges.com/globalassets/04hallbarhet/06local- policies/asia/250514-19-gsh-safety-performance.pdf		
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system for Workers' consultation and participation in Health and Safety. Worker representatives participate in weekly health and safety meetings where management responds to the concerns and advice on OH&S issues from Workers.		

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 July 2019	Initial Certification Audit - Full Certification
1	29 March 2021	Surveillance Audit - Update 'certificate presented to' to reflect Entity Name in full
2	16 August 2022	Re-Certification Audit – Full Certification
3	23 February 2024	Surveillance Audit
4	27 June 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.1. Scope Change to remove the supply chain activity 'Material Conversion' to reflect the Entity's actual operations.