

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Shandong Chuangyuan New Material Technology Co., Ltd.

CERTIFICATE NUMBER

463

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SGS-CSTC STANDARDS
TECHNICAL SERVICES

DATE OF ISSUE

11 AUGUST 2025

DATE OF EXPIRY

10 AUGUST 2028

CERTIFIED SINCE

11 AUGUST 2025

AUTHORISED BY

A stylized, handwritten signature in black ink.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at*
www.aluminium-stewardship.org

CERTIFICATION SCOPE

Alumina Refining process for the
manufacture of Alumina at
Shandong Chuangyuan New
Material Technology Co., Ltd., China

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Shandong Innovation Group Co., Ltd.
ENTITY NAME	Shandong Chuangyuan New Material Technology Co., Ltd.
CERTIFICATION SCOPE	Alumina Refining process for the manufacture of Alumina at Shandong Chuangyuan New Material Technology Co., Ltd., China
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">6 – 8 January 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2025
AUDIT SCOPE	<p>The Audit Scope included Alumina Refining process for the manufacture of Alumina at Shandong Chuangyuan New Material Technology Co., Ltd., China.</p> <p>Supply Chain Activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	11 August 2025 – 10 August 2028
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE	10 February 2027
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CERTIFICATE NUMBER	463
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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

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

ENTITY OVERVIEW

Shandong Chuangyuan New Material Technology Co., Ltd. (the 'Entity'), located north of Zhahe Bridge and Yanhe Road, Chengkou Town, Wudi County, Binzhou, Shandong, China, covers an area of approximately 78 hectares (excluding the red mud storage) and employs 819 persons, including 176 women. Established in 2018, the Entity specialises in Alumina Refining, with an annual output of 1.4 million tonnes of Alumina.

The Facility includes two Alumina Refining production lines, a 76-hectare red mud storage area, and auxiliary infrastructure, including office buildings, accommodation complexes, a spare parts warehouse, laboratory, a maintenance centre, and two car parks. The nearest sensitive receptor, Majia River Dehuixin River Wetland Park, is approximately one kilometre away.

The Entity's Products are primarily supplied to electrolytic Aluminium smelters in China. The Entity's key external Stakeholders include owners, partners, suppliers, contractors, customers, industry associations, employees, intermediaries, government agencies, third-party service providers, and banks.

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	High	MEDIUM
PERFORMANCE	High	High	Medium	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a Management System to ensure awareness of and Compliance with Applicable Laws. However, it has not identified or incorporated relevant carbon management Policies and standard requirements. The 2023 Sustainability Report is available at:</p> <p>https://www.siginnovation.com.cn/upload/file/2025/05/23/0997b80c-c967-4d28-8372-aeb453c3464d.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established a Supervision and Management Department to collect and handle complaints and grievances. An internal complaint management mechanism is in place, along with anti-Bribery and ethical conduct rules that apply to all personnel involved in management processes. The Entity's Complaints and Grievances Management Procedure is available at:</p> <p>https://www.siginnovation.com.cn/upload/file/2024/12/30/90125d9d-48fb-41ca-8376-af82334ee2d8.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Ethics and Business Conduct, incorporating principles of environmental, social and governance performance. It is signed by top management and available at:</p> <p>https://www.siginnovation.com.cn/upload/file/2024/12/30/542b21b0-bf96-491f-bdb2-8a1f774fdc7f.pdf</p> <p>The Entity conducts annual internal Audits and management reviews to ensure the effectiveness of the systems.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has developed and implemented Environmental, Social, and Governance (ESG) Policies, which cover environmental management, Occupational Health and Safety (OH&S), ASI performance and energy. Each Policy has been approved by the General Manager and documented accordingly. ESG Policies have been communicated internally through training.</p> <p>However, the Entity has not provided evidence of internal or external ESG Policy training, nor has it specified review timelines or whether Policies should be reviewed following changes.</p> <p>The ESG Policies are available at:</p> <p>https://www.siginnovation.com.cn/upload/file/2024/12/30/cf108b09-d93d-4075-a43b-48a6f8734a56.pdf</p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed the Director of Business Management as the ASI Management Representative, responsible for ensuring Compliance with ASI Performance Standards.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has developed and implemented an integrated Management System and is certified to ISO 14001:2015.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has documented and implemented an integrated Management System, certified to ISO 14001, ISO 45001, ISO 50001 and other standards. A Social Responsibility Management System</p>

CRITERION	RATING	COMMENT
		management procedure has also been established and implemented to manage risks related to Human Rights and Labour Rights.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a Responsible Procurement Policy addressing ESG issues. However, it did not provide evidence of external communication beyond its publication on the official website. The Policy is available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/c8d19de8-9f8b-4606-b73c-2de21afa8573.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity has not undertaken any New Projects or made Major Changes to existing Facilities since joining ASI in 2023.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as the Entity has not undertaken any New Projects or made Major Changes to existing Facilities since joining ASI in 2023.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site-specific Emergency Response Plans, which are registered with the local authority. Drills are conducted as scheduled, and their effectiveness is evaluated. The Entity's latest version of the Emergency Response Plan is available at: https://www.siginnovation.com.cn/upload/file/2025/01/07/ee047b8f-b2d7-4171-8a2f-c9e65541c02d.pdf The Safety Emergency Plan is available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/31e2516e-6fa6-4f43-aceb-42e3ffc3674.pdf The Emergency Plan for Sudden Environmental Accidents are available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/8ce43822-77f7-4438-84d7-35b91a37d4ce.pdf
2.8a-d Suspended Operations	Conformance	The Entity has not had any instances of suspended operations. If a suspension occurs, it will adjust production plans based on actual conditions, monitor Policy changes, and maintain timely communication with the Government to minimise environmental and social impacts. No Business changes or control gaps have been identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure to review ESG issues during Due Diligence for Mergers and Acquisitions. No such instances have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review ESG issues during the planning of Closure, Decommissioning, and Divestment. No such instances have occurred.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its 2023 Sustainability Report, outlining its Material environmental, social and economic impacts. The Report is available at: https://www.siginnovation.com.cn/upload/file/2025/05/23/0997b80c-c967-4d28-8372-aeb453c3464d.pdf

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	Since the financial Audit in 2024, no violations related to the Entity have been identified. The Entity has also not received any Material fines, judgments, penalties or non-monetary sanctions.
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented a Financial Review System for all payments, and third-party accounting firm audited the Entity's Financial Audit Report. Non-operating expenses included late fees, epidemic prevention and medical costs, and labour fees. No payments were made to the government, except for charitable donations. The Audit results are available on the Entity's website at: https://www.siginnovation.com.cn/upload/file/2025/01/08/532e2a6c-a18e-4ffc-93cc-9fe185efb910.pdf</p> <p>Evidence of donations from 2023 and 2024 is available at: https://www.siginnovation.com.cn/upload/file/2025/01/03/4eac079e-4461-4433-9642-3c98aebaacaa.pdf</p> <p>and https://www.siginnovation.com.cn/upload/file/2025/01/03/0d06e455-bca8-471f-87db-25f942ae7a43.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has published its Complaint and Appeal Management Procedure at: https://www.siginnovation.com.cn/upload/file/2025/01/09/a6985199-a749-44a9-bbb6-c49ab5fd31f1.pdf</p> <p>The Procedure is reviewed annually during the Management System Review and outlines public disclosure of dedicated hotlines and email addresses for different complaint types. These hotlines have been tested and confirmed operational.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>Alumina is the Entity's primary Product. The Entity has quantitatively evaluated its life cycle impact and disclosed the results at: https://www.siginnovation.com.cn/upload/file/2025/01/09/9cdfa60e-c001-493b-9351-f94ab702424e.pdf</p> <p>However, the reported Alumina footprint appears inconsistent with industry benchmarks and lacks sufficient evidence explaining the calculation methods and data sources.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>In 2024, the Entity publicly disclosed its LCA Report for Alumina at: https://www.siginnovation.com.cn/upload/file/2025/01/09/9cdfa60e-c001-493b-9351-f94ab702424e.pdf</p> <p>The report outlines the scope and system boundaries, assessing environmental impacts across raw material acquisition, production, transportation, usage, and Waste disposal stages.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has published its Greenhouse Gas (GHG) Emissions Verification Statement at: https://www.siginnovation.com.cn/upload/file/2024/12/30/640c0f8c-2e51-494e-8104-39b4f3f0a673.pdf</p> <p>The publicly disclosed data, verified by a third-party institute (Suzhou LQA Standard Certification Co., Ltd.), covers Scope 1, Scope 2, and Scope 3 emissions.</p> <p>However, inaccuracies were identified in the Scope 3 emissions data related to Alumina as a raw material.</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-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has publicly disclosed its latest GHG Reduction Plan based on 2023 GHG emissions at: https://www.siginnovation.com.cn/upload/file/2024/12/30/0da41326-70fc-408b-a266-de856f9a3920.pdf</p> <p>The Plan sets intermediate reduction targets through 2026 and 2029, outlining a pathway aligned with a 1.5°C warming scenario. The Entity aims to reduce carbon emissions by 3% by 2026 and by 5% by 2029, compared to 2023 levels.</p> <p>However, the Entity's progress against the 2024 GHG Emissions Reduction Plan has not yet been disclosed.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a Management System based on ISO 14064-1, developed in alignment with its GHG Emissions Reduction Plan. The System includes emission reduction measures and clearly defined responsibilities.</p> <p>Additionally, the Entity has established an Energy Management System in Compliance with ISO 50001:2018 to control GHG emissions from energy consumption. This System has been certified by a third party, with the certificate available in the 2023 Sustainability Report, Chapter 5.3.1 on page 23, available at: https://www.siginnovation.com.cn/upload/file/2025/01/08/68fb872a-ab0e-4c70-a9f7-10781406ac5d.pdf</p> <p>The Entity has also published a series of GHG Inventory Management Programmes to regularly account for and monitor its GHG emissions.</p>

6. EMISSIONS, EFFLUENTS AND WASTE

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has implemented an Emission Management Programme outlining requirements for managing atmospheric pollutant emissions. The program includes a plan to minimise exposure to and impacts from air emissions, which is reviewed every three years.</p> <p>An Atmospheric Pollutant Monitoring Plan is also in place, covering pollutants such as SO₂, NO_x and Total Suspended Particulates (TSP). An external auditor has verified online monitoring data.</p> <p>The Entity has reported its performance in controlling atmospheric pollutant emissions in its 2023 Sustainability Report, Chapter 5.4.1 on page 27, available at: https://www.siginnovation.com.cn/upload/file/2025/01/08/68fb872a-ab0e-4c70-a9f7-10781406ac5d.pdf</p> <p>However, Material Emissions to Air from the Entity's activities have not been quantified.</p>
6.2a-g Discharges to Water	Conformance	<p>All industrial wastewater is fully reused within the Entity's production system, resulting in zero discharge of production wastewater. Only domestic sewage is treated by a licensed sewage treatment Facility. The Entity has publicly disclosed a statement confirming zero industrial wastewater discharge in its Alumina production using the Bayer process, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/fe307612-b4e5-4959-8824-9eb7650dc2a1.pdf</p> <p>As a result, the Entity has not developed a wastewater reduction plan.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a Spills and Leakages Management Procedure requiring annual identification and assessment of potential Spill and Leakage risks. Based on these assessments, the Entity has developed Emergency Response Plans and conducts regular drills to test their effectiveness. The 2024 Spills Management Plan has been published on the Entity's official website at: https://www.siginnovation.com.cn/upload/file/2024/12/30/2458ce5f-4522-442f-964c-2ad32dc7de4c.pdf</p> <p>The procedure also outlines requirements for emergency response, remediation, training, monitoring, and communication with relevant parties. Additionally, the Entity conducts quarterly groundwater monitoring at the Bauxite Residue yard.</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable as no Spills or Leakages have occurred in the time since the Entity joined ASI.</p> <p>The Entity has publicly disclosed its 2024 Spills and Leakages Management Plan, which outlines the communication process with relevant parties following a Spill or Leakage incident at: https://www.siginnovation.com.cn/upload/file/2024/12/30/2458ce5f-4522-442f-964c-2ad32dc7de4c.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has publicly disclosed the quantity of solid Waste treated and the corresponding treatment measures on its website at: https://www.siginnovation.com.cn/upload/file/2024/12/30/d01a0653-629b-4dbf-9107-998aee21660a.pdf</p> <p>A system is in place to regularly assess the Material impacts of these Wastes on human well-being and the environment. Waste treatment measures are planned in Compliance with the Waste Mitigation Hierarchy and are subject to regular review. Environmental impact</p>

CRITERION	RATING	COMMENT
		assessments will be conducted for new construction projects in Compliance with Applicable Laws and regulations in China.
6.6a-g Bauxite Residue	Conformance	An Operation Manual for the Bauxite Residue Landfill Yard is in place, outlining requirements for pollutant control, monitoring, Environmental Impact Assessment, storage operations, and ecological restoration measures for the post-closure phase. The Entity uses the dry-stacking method for residue disposal, with no discharge of residue or wastewater into surface water. A high-density polyethylene (HDPE) anti-Leakage liner has been installed at the base of the landfill to prevent leachate from contaminating groundwater. The Entity conducts quarterly groundwater monitoring and has engaged a third party to assess risks related to the landfill, including displacement, flood discharge, and potential disaster hazards. To date, no risk events have occurred.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity had disclosed its Risk Assessment Report of Water Resources, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/d760ca1c-38a0-4783-91ac-e4a97950ff4e.pdf</p> <p>The Entity sources its water from surface water and municipal pipe networks. Actual water consumption is reported quarterly through the Water Use Statistics Survey Direct Reporting Management System. According to the plant's water balance diagram, no wastewater is discharged, and the impact on the environmental quality of nearby surface water bodies is minimal. Since operations began in 2012, the Entity has withdrawn only a small amount of water from the Majia River, posing no risk to local agricultural irrigation or domestic water use. Pipe network water is regularly tested for quality, and water source reservoirs have remained consistently full. Based on the assessment, the Entity's water use risk is considered low.</p>
7.2a-e Water Management	Conformance	<p>The Entity has established and disclosed its Water Resources Management Procedure on its website at: https://www.siginnovation.com.cn/upload/file/2024/12/30/f25af7fc-2be5-4305-aa67-1f92d0740c63.pdf</p> <p>This procedure assigns the technical department responsibility to draft and implement the water resources management plan, and develop effective measures in collaboration with Affected People and Organisations to address major water resource risks. Each production workshop is responsible for implementing water management and conservation measures. Additionally, the Entity has set water conservation targets and measures for a period of five years. The risk assessment of water resources is also disclosed on the Entity's official website, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/d760ca1c-38a0-4783-91ac-e4a97950ff4e.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services as low. Relevant control measures are outlined in the 2024 Risk Assessment Report on Biodiversity and Ecosystem Services, page 10: https://www.siginnovation.com.cn/upload/file/2025/01/07/1688b136-e3bf-4518-b4d3-5fd64007c095.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. No Alien Species have been introduced.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is located in a Government-designated industrial zone and has committed not to explore or develop New Projects in the World Heritage site.
8.6a-d Protected Areas	Conformance	The Entity is located in a Government-designated industrial zone, situated away from any Protected Areas, with all production and Business activities conducted within the industrial zone.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has disclosed its Human Rights Policy in the Human Rights Due Diligence Management Procedure on its website, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/dedf0c76-f274-4085-9fba-ea6b006ae07f.pdf The Policy affirms the Entity's commitment to respect Human Rights and promote gender equality. Human Rights Due Diligence is conducted and reported annually.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a procedure to promote gender equality and protect women's rights, which is publicly disclosed on its website, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/bbfbb9ec-382d-4e8f-a873-clc0132ed523.pdf Measures taken include ensuring equal pay for equal work, enhancing gender diversity in leadership positions, and providing equal career development opportunities for female employees. The Entity also

CRITERION	RATING	COMMENT
		<p>offers flexible work arrangements and parental leave for married female employees, establishes dedicated Grievance Mechanisms to report Discrimination and Harassment, and provides rest areas and lactation rooms. In addition, the Entity prohibits assigning high-risk tasks to female employees and guarantees protective leave Policies in Compliance with legal requirements for menstruation, pregnancy, and lactation-related health needs.</p> <p>The 2023 Sustainability Report (Chapter 6.1.1, page 34), outlines its initiatives and achievements in advancing gender equality and to protect women's rights, available at: https://www.signnovation.com.cn/upload/file/2025/05/23/0997b80c-c967-4d28-8372-aeb453c3464d.pdf</p> <p>Interviews with the Entity's female employees indicated no violations of women's rights.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a Cultural and Sacred Heritage Management Programme to ensure the protection of Cultural and Sacred Heritage within its operational scope. As part of this programme, the Entity commits to identifying any Cultural or Sacred Heritage prior to the construction of New Projects. A reference list of designated Cultural and Sacred Heritage sites in Shandong Province is maintained to support this process. No Cultural or Sacred Heritage sites have been identified within a 10-kilometre radius of the Entity's construction projects.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no Cultural or Sacred Heritage sites have been identified within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has established procedures to ensure that, in the event of a physical relocation project, key actions are implemented, including the identification of affected parties, development of a Resettlement action plan, implementation of Free, Prior, and Informed Consent (FPIC), and the prohibition of project advancement without explicit FPIC approval. Importantly, the Resettlement plan must incorporate women's interests, expectations, and participation in decision-making processes to ensure equitable treatment beyond compensation for affected assets. To date, the Entity has not undertaken any Resettlement projects.

CRITERION	RATING	COMMENT
		<p>The Entity's Displacement Management Program is publicly available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/4441e9ef-6489-43f1-9d91-f24fc0fa06f6.pdf</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has stipulated its pollution control measures and action plans within its Displacement Management Programme, aiming to minimise adverse impacts on the livelihood activities of nearby populations and organisations. The Entity has identified the affected parties as marine aquaculture farmers located near the Bauxite Residue yard. Although the nearby marine aquaculture farm is state-owned, the Entity conducted both environmental and Human Rights Impact Assessments prior to constructing the yard and disclosed the results to the farmers. During the six-month public notice period, no appeals or objections were received.</p> <p>The on-site telephone interviews with neighbouring shrimp farmers, confirmed that the Bauxite Residue yard had not affected their shrimp harvest. Construction was carried out in Compliance with environmental laws and standards. Following the Completion Acceptance of the Environmental Impact Assessment, the Entity conducts monthly groundwater testing in the Bauxite Residue yard. Additionally, an independent third party is engaged annually to assess safety risks, flood control measures, and Leakage risks.</p> <p>As there were no Indigenous Peoples or other community residents present prior to construction, a Resettlement plan was deemed not applicable. A Plan for the Management of Impacts to Affected Populations and Organisations has been disclosed on the Entity's website at: https://www.siginnovation.com.cn/upload/file/2024/12/30/1b27d84a-e844-4d6b-bf39-7e9b1f338ad4.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has established a Supplier Management System, published a Responsible Sourcing Policy, and implemented a Conflict-Affected and High-Risk Areas (CAHRAs) Management Procedure, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/56b2a651-6d92-4abe-9bb0-13b06fe8e7ab.pdf</p> <p>These frameworks mandate Due Diligence on Bauxite suppliers, define accountability mechanisms, and mitigate Human Rights risks across the Bauxite supply chain.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity identifies and evaluates supply chain risks using frameworks such as the EU CAHRAs List, the Dodd-Frank Act CAHRAs List, the UN Security Council Sanctions List, and the Heidelberg Conflict Barometer. It selects suppliers with a risk level below 3 as its supply chain Stakeholders.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has established a Supplier Management System and a Management Procedure for CAHRAs, which stipulates that if a Bauxite supplier is identified as posing a conflict mineral risk during Due Diligence, they will be removed from the Qualified Supplier List, and no further procurement will occur. The 2024 supplier Due Diligence confirmed that none of the Bauxite sourced came from CAHRAs.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.</p>

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity has developed Management Procedures for CAHRAs, which require annual disclosure of supply chain Due Diligence reports. The Entity has published its Supply Chain Due Diligence Report on its website, available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/6aeb20ca-fbf2-4e4f-895c-d485dc338384.pdf
9.9 Security practice	Conformance	The Entity requires its security staff to respect Human Rights. The Security Management Programme mandates that Human Rights be upheld during entrance procedures, and prohibits practices such as body searches, withholding credentials or deposits, and any form of physical or verbal abuse.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has established regulations defining Freedom of Association and the right to Collective Bargaining. It has also developed procedures to form and elect Worker committees, including providing notices and implementation plans for their establishment. Worker representatives are empowered to express employees' concerns to management.
10.2a Child Labour	Conformance	The Entity has a Policy prohibiting Child Labour. There are no child or underage Workers employed, with the youngest Worker being 22 years old. In Compliance with Chinese law, Child Labour is prohibited, and Workers aged 16 to 18 receive special legal protections, including restrictions on Hazardous work. The Entity fully complies with these regulations.
10.3a-c Forced Labour	Conformance	The Entity has established regulations prohibiting Forced Labour, reinforced by an employee handbook that explicitly forbids it. Interviews and document reviews confirm that all Workers have signed labour contracts. The Entity neither participates in nor supports Human Trafficking, directly or through recruitment agencies. Worker interviews and documentation further confirm there are no illegal wage deductions, Debt Bondage, or other forms of Forced Labour. The Anti-Human Trafficking Management Procedures (Modern Slavery Statement) and implementation information are publicly available at: https://www.siginnovation.com.cn/upload/file/2024/12/30/7c1715a0-b4ca-42bf-b532-62feb9126dbb.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established a Non-Discrimination Management Procedure and an Employee Handbook containing anti-Discrimination provisions. These ensure equal opportunities in recruitment, salary, promotion, training, and dismissal, prohibiting Discrimination based on sex, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other grounds. This aligns with ILO Conventions C100 and C111. The Entity is committed to non-Discrimination, and no instances have been reported.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity maintains direct and frequent communication with Workers and their representatives about working conditions and workplace or compensation issues. This communication is facilitated through multiple channels, including regular general manager office meetings, monthly online surveys, and on-site interviews with frontline employees. Feedback mechanisms such as internal complaint boxes are also in place to encourage open dialogue. These systems ensure that employees can raise concerns or suggestions freely and confidentially, without fear of reprisal, intimidation, violence, or harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established Policies to prevent workplace Violence and Harassment, along with a Complaint and Resolution Mechanism for such incidents. It respects employees, ensures disciplinary actions comply with legal requirements, and enforces Human Rights Policies prohibiting Violence and inhumane treatment. Details can be found in the 2023 Sustainability Report, available at: https://www.siginnovation.com.cn/upload/file/2025/05/23/0997b80c-c967-4d28-8372-aeb453c3464d.pdf</p> <p>Worker interviews indicate no Violence or Harassment has occurred within the Entity.</p>
10.7a-c Remuneration	Conformance	The Entity has a clear wage structure, with monthly wages generally meeting local minimum wage standards. It provides all employees with five social insurances and one housing fund, ensuring basic Workers' needs are met. All employees participate in the mandatory social insurance programme. The Entity has established a salary management procedure that ensures monthly wage payments are made in legal currency, with complete record-keeping. Employees from various departments have reviewed the procedure and samples of bank transfer records.
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity's labour time and Remuneration management procedures define employee Working Time requirements. The Entity operates on a three-shift, two-team rotation schedule.</p> <p>However, based on employee interviews and attendance record reviews, it was found that employees work Overtime exceeding 36 hours per month, reaching up to 64 hours in some cases. Additionally, some employees have worked up to 12 consecutive days, which does not comply with the requirement of at least one rest day in every seven. Over the past six months, workshop employees have worked an average of 8.34 hours per day, exceeding the standard eight-hour workday limit.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity has developed Policies, including an employee handbook, non-Discrimination management procedures, and gender equality and women's rights management procedures. Employees are informed of their rights to Freedom of Association and Collective Bargaining through training sessions, emails, notices, and regular meetings. The Entity has also established a Freedom of Association and Collective Bargaining Rights Management Procedure, which affirms that all employees have the right to exercise these freedoms without fear of punishment or retaliation.

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System and published an Environmental, Health and Safety Policy. It has obtained ISO 45001:2018 certification from an independent third-party institution. The certificate is available at: https://www.signnovation.com.cn/upload/file/2025/01/10/177a0f28-2be5-47be-9c86-303816f84363.pdf The latest certification Audit report confirms that the OH&S Management System is functioning properly.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	The Entity has publicly disclosed its OH&S Management System performance, including analysis of leading and lagging indicators, available at: https://www.signnovation.com.cn/upload/file/2025/01/08/997b124d-8605-4f33-87c7-bfa935ca8149.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a Safety Committee that enables employee participation in OH&S decision-making. The committee includes employee representatives and holds quarterly meetings to discuss and resolve Health and Safety issues. A review of sampled meeting minutes confirmed that employee representatives actively participated, and their concerns were addressed.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 August 2025	Initial Certification Audit – Full Certification