## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

### Zhejiang Huashuo Technology Co., Ltd

CERTIFICATE NUMBER

370

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

**20 AUGUST 2025** 

**CERTIFICATION LEVEL** 

PROVISIONAL CERTIFICATION

DATE OF EXPIRY

19 AUGUST 2026

ASI ACCREDITED AUDITING FIRM

SHANGHAI KYLIN CERTIFICATION SERVICE CO., LTD.

**CERTIFIED SINCE** 

20 AUGUST 2024

AUTHORISED BY

The \_\_

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 and processing of precision die-casting for Aluminium automotive parts at Zhejiang Huashuo Technology Co., Ltd – Factory 3, located in Beilun District, Ningbo, Zhejiang, China.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

OVERVIEW				
MEMBER NAME	Zhejiang Huashuo Technology Co., Ltd			
ENTITY NAME	Zhejiang Huashuo Technology Co., Ltd			
CERTIFICATION SCOPE	Manufacture and processing of precision die-casting for Aluminium automotive parts at Zhejiang Huashuo Technology Co., Ltd – Factory 3, located in Beilun District Ningbo, Zhejiang, China.			
SUPPLY CHAIN ACTIVITIES	<ul><li>Casthouses</li><li>Semi-Fabrication</li></ul>			
ASI STANDARD	Performance Standard V3			
AUDIT TYPE	<ul> <li>Initial Certification Audit (28 - 30 January 2024)</li> <li>Surveillance Audit (24 - 25 February 2025)</li> </ul>			
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.			
AUDIT DATE	<ul> <li>28 - 30 January 2024 (Initial Certification Audit)</li> <li>24 - 25 February 2025 (Surveillance Audit)</li> </ul>			
AUDIT REPORT SUBMISSION	<ul><li>1 April 2024 (Initial Certification Audit)</li><li>9 June 2025 (Surveillance Audit)</li></ul>			
AUDIT SCOPE	Initial Certification Audit (28 - 30 January 2024)  The Audit Scope included the design, manufacture and processing of precision diecasting for Aluminium automotive parts at Zheijiang Huashuo Technology Co., Ltd Factory 3.			
	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.			
	Surveillance Audit (24 – 25 February 2025)  The Audit Scope included the design, manufacture and processing of precision diecasting for Aluminium automotive parts at Zheijiang Huashuo Technology Co., Ltd Factory 3.			
	Supply chain activities included in the Audit Scope:  Casthouses  Semi-Fabrication			

Criteria in the ASI Chain of Custody Standard that were identified as Non-

Conformities from the previous Surveillance Audit.

Provisional Certification			
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.			
20 August 2025 - 19 August 2026			
Surveillance Audit			
20 February 2026			
370			



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <a href="https://Aluminium-stewardship.ethicspoint.com/">https://Aluminium-stewardship.ethicspoint.com/</a>

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**

Factory 3 of Zhejiang Huashuo Technology Co., Ltd. (the 'Entity'), located at No. 9 Canglongshan Road, Beilun District, Ningbo, Zhejiang, China, commenced operations in 2017. With an annual production of 30 kilotonnes of Aluminium, the Entity currently employs approximately 950 people. The Entity specialises in producing semi-solid forming solutions and lightweight Aluminium alloy die-casting parts for new energy vehicle batteries and motor and electric control systems. The Entity is currently a provider of motors for new energy vehicles, as well as inverter and battery components worldwide. It also provides solutions and die-casting products used in automotive lightweight structure parts.

### **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	Low	MEDIUM
RISKS	Low	Medium	Low	LOW
PERFORMANCE	Low	Medium	Low	LOW
OVERALL		LOV	N	

### **FINDINGS**

CRITERION	RATING	COMMENT		
1. BUSINESS INTEGRITY	1. BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has established a 'Legal, Regulatory, and Other Requirements Acquisition Procedure', which specifies the collection, acquisition and use of regulations related to ASI. The Entity has also developed a 'List of Social Responsibility Regulations', 'Compliance Evaluation of Labor and Business Ethics Regulations' and an 'EHS Record of Compliance Evaluation of Laws and Regulations'.  The Entity has received feedback from the local Environment Protection Bureau regarding the acceptance of the fire protection filing review for construction projects, Environmental Impact Assessment reports, the 2023 Occupational Disease Hazard Status Assessment Report, and the 2023 Annual Monitoring Report on Building Fire Protection Facilities.		
1.2 Anti-Corruption	Conformance	The Entity has implemented a Business Ethics Management Procedure, that prohibits any form of Bribery, Corruption, Extortion and embezzlement.		
		The Entity has established ASI Policies, including anti-Corruption Policies, continuous anti-Corruption to promote integrity, fairness, openness, and transparency. The Entity has implemented an 'Integrity and Corruption Risk Assessment' form to identify risks in administrative, procurement, technical quality, business, and other positions, identified internal and external integrity risks, assigned values for the probability of occurrence, degree of harm, and risk level, set prevention and control measures, and implemented appropriate risk management measures.		
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, which aims to comply with regulatory and ethical requirements and established internal ethical standards covering Human Rights, labour, EHS, Business ethics, anti-Corruption and anti-Bribery, protection of company assets, integrity, confidentiality of confidential information, fair trade, antimoney laundering, communication and compliance and reporting.		
		The Code of Conduct must be reviewed every five years or when there are changes or defects in the Entity in accordance with their ASI Manual. The Code of Conduct is available at: http://www.china-huashuo.com/cn/DownLoad/144120.html		
2. POLICY AND MANAGEMENT				
2.1a-f Environmental, Social, and Governance Policy	Minor Non- Conformance	The Entity has formulated a comprehensive ASI Policy covering several Environmental, Social and Governance (ESG) topics. The program 'Management Review Procedure' requires an annual management review to be conducted and input into the ASI process performance and to review the suitability of the policy.		
		It was identified however that the Entity did not conduct an annual management review and did not conduct a re-evaluation or review of the ASI Policy.		
		The ASI Policy is available at: http://www.china-huashuo.com/cn/DownLoad/184240.html		

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity has appointed the Vice President of QHSE and Sustainable Development as the Management Representative. The appointment letter was signed by the Chief Executive Officer (CEO). The Management Representative is responsible for ASI-related affairs, internal and external liaison, and implementing the Entity's ASI Policy, related Policies and goals.
		The Entity's Management Review Procedure stipulates the Management Representative is in charge of the annual evaluation and provision of resources required for the implementation of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an ISO 14001 certified Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Social Responsibility Management System certified ISO 45001 and has implemented social management procedures covering Women's Rights, Social Factor Identification/Risk Assessment and Control, Child Labour, Underage Workers, Prohibition of Forced Labour, Prohibition of Discrimination, Disciplinary Measures, Remuneration and Working Hours.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a 'Supplier and Subcontractor Management Procedure' and a Responsible Purchasing Policy covering compliance with laws and regulations, Human Rights and labour, quality and safety, energy conservation and environmental protection, fairness and justice. Evaluations and revisions of the procedure and Policy will be conducted every five years, or when there are significant ESG changes.  The Entity has provided a list of qualified suppliers, evaluation records of suppliers for different grades of Aluminium ingots, and records of
		the Partner Code of Conduct signed by suppliers, which includes requirements for social responsibility, environment, conflict minerals, business integrity and confidentiality. Two suppliers were audited in 2024, and any non-compliance identified has been corrected to the Entity plans to review the two suppliers in 2025.
		The Responsible Purchasing Policy is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/152877.html">http://www.china-huashuo.com/cn/DownLoad/152877.html</a>
		The Entity's 2023 Social Responsibility Report is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/144241.html">http://www.china-huashuo.com/cn/DownLoad/144241.html</a>
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has established a 'Social Factor Identification and Risk Assessment and Control Management Procedure'. In compliance with ISO 14001 and ISO 45001 Management Systems, an annual assessment of environmental and Health and Safety impacts is required.
		The Entity currently has three technological renovation projects underway. These are:
		<ul> <li>Automotive Lightweight Aluminium Magnesium Alloy Casting</li> <li>Production Technical Renovation Project;</li> <li>Transformation Project of the Automotive Key Parts Production</li> </ul>
		<ul> <li>Line; and,</li> <li>Technical renovation project for the production line of key components of new energy vehicles.</li> </ul>

CRITERION	RATING	COMMENT
		Two new technological transformation project plans were prepared in February and September 2024. An Environmental Impact Assessment Report for one of the three new technology renovation projects was approved by the Environmental Protection Department, whilst the other two are in preparation and will be submitted to the local environmental protection department.
		The approved 'Environmental Impact Statement for Construction Projects' report is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/144121.html">http://www.china-huashuo.com/cn/DownLoad/144121.html</a>
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has established a Social Factor Identification and Risk Assessment and Control Management Procedure. The ASI Manual stipulates that the Human Resource Department conducts Due Diligence on Human Rights and evaluates potential risks. The assessment results indicate that there have been no Human Rights violations.
		The Entity currently has three technological renovation projects, and two new technological transformation project plans were prepared in February and September 2024. One Environmental Impact Assessment Report for one of the three new technology renovation projects was approved by the Environmental Protection Department, and the other two are in preparation and will be submitted to the local environmental protection department.
		The production line technology renovation project is expected to involve approximately 200 employees, who will be allocated to meet production needs without increasing or decreasing the number of employees.
		The results of the Entity's evaluation of Human Rights and the Entity's 2024 Sustainability Report have not yet been completed.
		The 2023 Sustainability Report is however available and includes a section on Human Rights Impact Assessment, 'Chapter 3, Employees' rights and benefits', pages 21-24 and 'Chapter 08, Employees' training and development', pages 53-56: <a href="http://www.china-huashuo.com/cn/DownLoad/144241.html">http://www.china-huashuo.com/cn/DownLoad/144241.html</a>
2.7a-f Emergency Response Plan	Conformance	The Entity has established the Comprehensive Emergency Plan for Safety Production Accidents Procedure, which requires an evaluation of the emergency plan every three years. The detailed plan has been registered with the local Beilun District Emergency Management Bureau. The plan includes fire, explosion, poisoning, mechanical injury, safety accidents, and chemicals. The Entity has established an Emergency Plan for Sudden Environmental Events, which specifies emergency plans for air pollution, water pollution, and other emergencies. Both Emergency Response Plans are available at:
		Comprehensive emergency plan for production safety accidents: http://www.china-huashuo.com/cn/DownLoad/144114.html
		Emergency Plan for Sudden Environmental Events: http://www.china-huashuo.com/cn/DownLoad/144118.html
2.8a-d Suspended Operations	Conformance	The Entity has developed an Emergency Plan and remedial measures for typhoons, floods, fires, equipment failures, strikes, logistics interruptions, and information system failures. For fire emergencies, specific chemical operation standards have been established.

CRITERION	RATING	COMMENT
		The Emergency Plan for Sudden Environmental Incidents includes emergency response plans for major environmental incidents. The Comprehensive Emergency Plan for Safety Accidents includes emergency response measures related to safety accidents.
		The Entity has also developed a Business Continuity and Disaster Recovery Plan Management Procedure. The Procedure requires the Plan to be reviewed every five years, or whenever there are changes to the Business that alter the nature or scale of ESG risks, or if any indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Entity's ASI Manual stipulates that the Entity is to consider environmental, health and safety, social, and corporate governance factors during Mergers and Acquisitions. The CEO's Office will organise a survey and analysis of the target company for any potential Merger or Acquisition project. There have been no Mergers or Acquisitions in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity's ASI Manual stipulates that in the event of closure, retirement or divestment, the President's Office should aim to avoid or mitigate negative environmental and social impacts in accordance with the environmental and social management requirements. There have been no such cases in recent years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's 2023 Sustainability Report includes information on its sustainable development strategies, employee rights and benefits, environment and safety, climate change action, innovation and products, sustainable supply chain, employee training and development, and corporate compliance assurance. The report also disclosed the impact of the Entity's activities on the environment, society, and economy.  The 2023 Sustainability Report is available at: http://www.china-
		huashuo.com/cn/DownLoad/144241.html  At the time of the Audit, the Entity's 2024 Sustainability Report is still under development.
3.2 Non-compliance and Liabilities	Conformance	The 'Legal and Compliant Operations' section of the Entity's 2023 Sustainability Report publicly declares that the Entity has not been fined, sentenced, or punished for any illegal or irregular activities. No violation records were found on government websites for 2024.
		The 2023 Sustainability Report is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/144241.html">http://www.china-huashuo.com/cn/DownLoad/144241.html</a>
3.3a-c Payments to Governments	Conformance	The Entity's 2024 Compliance Operations and Government Payment Disclosure Statement is included in the Whistleblower Policy, available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184247.html">http://www.china-huashuo.com/cn/DownLoad/184247.html</a> This Statement discloses the amount and confirms that payments to
		the government only include taxes, social security contributions, and environmental protection fees.
3.4a-f Stakeholder Complaints, Grievances	Minor Non- Conformance	The Entity's ASI Manual stipulates that the Entity can receive information inquiries, complaints, and appeals from all parties through telephone and email. The Human Resources Centre is responsible for

CRITERION	RATING	COMMENT
and Requests for Information		obtaining feedback from internal and external Stakeholders. No relevant complaints have been received to date.
		However, during the Audit the Auditor called the complaint hotline to test its functioning and found that it had been converted to a recruitment hotline. The complaint email has not been publicly released.
		The Whistleblowing Policy is disclosed at: <a href="https://www.china-huashuo.com/cn/DownLoad/184247">www.china-huashuo.com/cn/DownLoad/184247</a>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non- Conformance	The Entity has developed a product Environmental Life Cycle Assessment (LCA) Report for their main Aluminium alloy Product with a one-tonne Aluminium alloy shell (model TA5511) selected. It includes carbon footprint, acidification, ecological toxicity, eutrophication, ozone and land use. It was identified however that the carbon footprint data in the LCA report is incorrect, and the latest Aluminium emissions factor was not used.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity can provide product LCA reports upon the customer's request. The report includes data analysis from 'cradle to gate' and is publicly disclosed at:  http://www.china-huashuo.com/cn/DownLoad/184249.html
4.2 Product Design	Conformance	The Entity has set a target of a 95% finished product qualification rate for the whole production process to reduce Scrap.
		The Engineering Department communicates the design map with the client to provide technical recommendations on structural wall thickness and other aspects based on customer requirements in the design analysis phase. The Entity's Engineering Department also performs tolerance control during mould design and optimises the design during the grinding tool pouring stage. The Entity has some automotive clients and is involved in the lightweight design process.
4.3a-b Aluminium Process Scrap	Conformance	The Entity's workshop and warehouse recycle Aluminium alloy Scrap according to their grades or brands. Some of the Aluminium Scrap, which can be reused within the Entity, are sent back to the workshop for remelting. Aluminium Scrap that cannot be recycled due to process reasons are sold to renewable resource companies or other Aluminium companies to achieve the goal of 100% recycling. The workshop has a 95% product pass rate throughout the Entire process to reduce the proportion of Aluminium Scrap generated.
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	The Entity's products are primarily supplied to vehicle manufacturers. In China, regulations govern the disposal of scrapped and 'End of Life' vehicles, which are typically processed by qualified car scrapping companies. Cars sold abroad are subject to local regulations on

CRITERION	RATING	COMMENT
		scrapping. As a result, customers' waste is not directly recycled by the Entity.
		During the procurement phase and with clients' consent, the Entity will purchase recycled Aluminium materials for production as raw materials. The chapter on environmental safety indicators in the 2023 Sustainable Development Report explains the methods of waste collection and utilisation. The Entity has developed a recycling strategy that plans to increase the recycled Aluminium rate as a raw material from 30% to 50% within three years. http://www.china-huashuo.com/cn/DownLoad/184246.html
5. GREENHOUSE GAS EMISSION	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non- Conformance	The Entity provides inventory and verification reports and calculated Greenhouse Gas (GHG) emissions data for Scopes 1-3. The inventory includes information on the use of raw materials and energy as well as a third-party validation report. The Greenhouse Gas Statement Verification Report 2024 is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184255.html">http://www.china-huashuo.com/cn/DownLoad/184255.html</a>
		However, the GHG emissions factor of Aluminium ingots used is incorrect and has resulted in inaccurate calculations. This is noted in the verification report.
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	Minor Non- Conformance	The Entity has formulated an Emissions Reduction Plan and plans to achieve carbon neutrality by 2045. The plan is to achieve carbon neutrality for Scopes 1 and 2 by 2025, reduce emissions by 25% for Scope 3 by 2030, deliver 'carbon-neutral' products for payment by 2039, and achieve corporate 'carbon neutrality' by 2045.
		The Carbon Reduction Plan is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184254.html">http://www.china-huashuo.com/cn/DownLoad/184254.html</a>
		However, the Emissions Reduction Plan formulated by the Entity and the GHG Emissions Reduction Pathway does not meet the methodology recognised by ASI in accordance with a 1.5 °C warming scenario.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non- Conformance	The Entity's Carbon Reduction Plan has set 2023 as the baseline year with the goal to reduce carbon emissions by approximately five percent annually from 2024 to 2028. The Entity has formulated emission reduction measures by purchasing green electricity, promoting photovoltaic project power generation, promoting supply chain emission reduction, and purchasing and using 'green energy' Aluminium materials. In terms of internal energy conservation, the Entity has formulated energy-saving measures including using variable frequency motors and preheating utilisation of furnaces.

CRITERION	RATING	COMMENT
		The Carbon Reduction Plan is reviewed annually and is available at: http://www.china-huashuo.com/cn/DownLoad/184254.html
		However, the Emissions Reduction Plan formulated by the Entity and the GHG Emissions Reduction Pathway does not meet the methodology recognised by ASI in accordance with the 1.5 degree warming scenario and also does not include Intermediate Targets.
5.4 GHG Emissions Management	Conformance	The Entity has established a Greenhouse Gas Accounting Management Procedure, which requires the Entity to undertake energy conservation and consumption reduction in the production process. The Entity's Emission Reduction Plan includes emission reduction measures through the purchase of green electricity, photovoltaic project power generation, supply chain emission reductions, and the purchase and use of 'green energy'-produced Aluminium materials.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has commissioned a third party to conduct atmospheric emissions testing. The detection data provided by the Entity did not exceed the standard limits, and the Entity plans to continue reducing emissions by one percent by 2025.
		The 2024 Wastewater and waste gas emissions results and 2025 Emissions Reduction Plan is available at:  http://www.china-huashuo.com/cn/DownLoad/184238.html
6.2a-g Discharges to Water	Conformance	The Entity has installed an online detection device that connects to the environmental protection department to monitor wastewater. The Entity regularly conducts Chemical Oxygen Demand (COD), ammonia nitrogen, pH and other tests on wastewater. The Entity has formulated a plan to reduce wastewater discharges by one percent by 2025.
		The 2024 Wastewater and waste gas emissions results and the 2025 Emissions Reduction Plan are available at: http://www.china-huashuo.com/cn/DownLoad/184238.html
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has developed a List of Leakage/Leakage Risk Identification and Evaluation, which outlines the potential risks of leakage and seepage that may arise during the operation process. The emergency plans were developed to identify potential risks, conduct emergency drills, regularly monitor pollution emissions, establish management systems, and implement control measures including regular inspections by the EHS Department.
		This Leakage/Seepage Risk Identification and Assessment Checklist is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184256.html">http://www.china-huashuo.com/cn/DownLoad/184256.html</a>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity as there have been no Spills or Leakages since the Entity joined ASI.
6.5a-c Waste Management and Reporting	Conformance	The Hazardous Wastes generated by the Entity are recorded and handled by a licensed contractor. General waste and Aluminium materials that can be recycled and reused are recycled or sold for reuse, while other recyclable waste materials would be sold for reuse.

CRITERION	RATING	COMMENT
		The 2024 Solid Waste Management Information Disclosure is available at: http://www.china-huashuo.com/cn/DownLoad/184245.html
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has a designated hazardous materials warehouse for storing Aluminium Dross, equipped with protective measures and a storage environment that meets basic regulatory requirements. The Entity has also established a management ledger to record both storage and transfer volumes. The Entity's Aluminium ash residue is transferred to qualified enterprises for recycling and reuse as Hazardous Waste.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has prepared a 2024 Water Resource Risk Assessment Report which analysed the risks of water resource use and its impacts on the surrounding environment and residents and maintained a lowrisk rating for its water resource usage. Compared with 2023, the Entity has reduced its water consumption by approximately 16% in 2024, fulfilling its commitment to reduce water resource use.
		The Entity has disclosed its 2024 Water Resource Risk Assessment Report, available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184253.html">http://www.china-huashuo.com/cn/DownLoad/184253.html</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as there were no significant water-related risks identified in the Entity's Area of Influence.  The Entity has however maintained an evaluation system for the performance indicators of water resource use. Records show that the water-saving objectives for 2023 were achieved based on monthly performance indicators.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has updated its Biodiversity Risk Assessment Report for 2025 which is publicly available at: <a href="http://www.china-huashuo.com/cn/DownLoad/184250.html">http://www.china-huashuo.com/cn/DownLoad/184250.html</a> The Entity has maintained its principles for Biodiversity management
		and re-evaluated the substantive impacts on Biodiversity. Based on the evaluation results, it has maintained the low risk assessment for Biodiversity risks in its surrounding environment.
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 has 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 has identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.

CRITERION	RATING	COMMENT
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 has maintained the identification of potential pathways for introducing alien species and formulated and implemented corresponding prevention and control measures to prevent the accidental or intentional introduction of such species. According to interviews, no Alien Species have been identified within the Entity's operating area.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	Whilst there are no World Heritage sites within the Entity's Area of Influence, the Entity has however committed in its ASI Manual not to undertake construction activities in World Heritage sites or religious places.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as there are no World Heritage Properties within the Entity's Area of Influence.
		Through interviews and verification with mapping software, it was confirmed that there are no Protected Areas around the Entity and has committed not to undertake construction activities in Protected Areas.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity's ASI Management Policy includes a commitment to respect Human Rights and labour rights. The Entity has established a Due Diligence Management Procedure and prepared a 2024 Human Rights Due Diligence Report, which includes Child Labour, Forced Labour, and respect for women's rights
		The Human Rights Due Diligence Report concluded that there are no social responsibility or Human Rights issues and is available at: http://www.china-huashuo.com/cn/DownLoad/184248.html
		In addition, the Entity has developed an Affected Personnel Management Plan and analysed the affected population and management methods.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established the Women's Rights Management Procedure, which protects women's rights in areas including employment, training, promotion, and pregnancy. The Entity has signed a collective contract with female employees for the protection of women's rights and interests.
		The Human Rights Due Diligence Report includes policies and actions of Gender Equity and Women's Empowerment and is available at: <a href="https://www.china-huashuo.com/cn/DownLoad/184248.html">https://www.china-huashuo.com/cn/DownLoad/184248.html</a>
		Data on the effectiveness of the measures taken to promote gender equity is disclosed in the 2023 Sustainability Report, page 55: http://www.china-huashuo.com/cn/DownLoad/144241.html

CRITERION	RATING	COMMENT
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. The Entity is located in Beilun District in Ningbo City.
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, as there are no Indigenous Peoples in the Entity's Area of Influence.
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	Conformance	The nearest Cultural and Sacred Heritage site is the Ashoka Ancient Temple is located approximately three kilometres away. The Entity has conducted an Environmental Impact Assessment (EIA) in accordance with regulatory requirements and has been approved by the Environmental Protection Bureau. Environmental emission testing demonstrates that its emissions comply with relevant standards and do not affect the temple.
		Emissions testing within the past year has confirm that the Entity's emissions met the environmental standards.
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 the renovation project does not involve the relocation or resettlement of Affected Populations and Organisations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed a Community Management Procedure. The program stipulates that the Entity must respect the legal and traditional rights of local communities in terms of land, livelihoods, and applicable natural resources. During the Audit, a phone interview undertaken with a representative from a nearby village committee, confirmed that the relationship between the Entity and the community is relatively harmonious, and there have been no complaints regarding non-compliance with labour laws.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established Supplier and Subcontractor Management Procedures and Social Factor Identification and Risk Assessment Control Management Procedures. The Entity does not purchase raw materials from Conflict-Affected and High-Risk Areas (CAHRAs) and requires suppliers to ensure that Human Rights are not violated.
		The Entity's ASI Social Factor Identification and Risk Assessment has identified conflict areas as high-risk, and the response measures are taken, either requiring suppliers to stop purchasing from these, or for the Entity to cease cooperation with suppliers.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity requires suppliers to complete a social responsibility survey questionnaire and conduct a document or on-site evaluations for some suppliers. Suppliers are required to sign a Commitment Letter for Not Using Conflict Minerals. The Entity provided commitment letters at the Audit for review.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk-based Due Diligence process over its Aluminium supply chain did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.  The Entity has added conflict minerals to the supplier audit checklist and evaluates some suppliers annually and conducts regular supplier reviews.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The responsible conflict mineral management process is disclosed in the supply chain sustainable development capacity building section of the 2023 Sustainability Report, page 50 <a href="http://www.china-huashuo.com/cn/DownLoad/184247.html">http://www.china-huashuo.com/cn/DownLoad/184247.html</a>
9.9 Security practice	Conformance	Security personnel are employed by the Entity and are managed by the Administrative Department. The Entity's ASI Manual and its security system require all security personnel 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 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 the Management Procedure for Freedom of Association and the Right to Collective Bargaining to establish, maintain and implement Policies on Workers' freedom of association and the right to collective bargaining, ensuring employees are free from Discrimination and company activities comply with local regulations and requirements.  The representatives of the Workers' Union and the women employees'
		committee are elected every three years.  The Union that employees are a part of, is jointly organised by enterprises in the local industrial park, supported by the local government and protected by law. The Union organises and distributes benefits to its members, and interviews undertaken during the Audit confirm that employees are enthusiastic to participate in the Union.
10.2a-c Child Labour	Conformance	The Entity has established a Child Labor Management Procedure and Minor Worker Management Procedure, which sets clear requirements for the management of Child Labour and Workers who are minors. The youngest male and female employees are both over 18 years old. Interviews and on-site observations confirmed there are no cases of suspected Child Labour or minor Workers. The Entity's ASI Manual

CRITERION	RATING	COMMENT
		includes a commitment to not use or support the worst forms of Child Labour and has established remediation measures.
10.3a-c Forced Labour	Conformance	The Entity has established a Forced Labour Prohibition Management Procedure, which stipulates the prohibition of Forced Labour and protects Workers' freedom. Through interviews, it was confirmed that the Entity does not support Forced Labour, and all employees have signed labour contracts with the Entity. When employees commence employment, there are no additional fees, and there are no cases of Debt Bondage. Employees have the right to resign at their own discretion.  The Entity's Modern Slavery Statement is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/152875.html">http://www.china-huashuo.com/cn/DownLoad/152875.html</a>
10.4a-c Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Procedure to protect all employees from discrimination. Interviews with employees and on-site observations confirmed that employees work in a favourable environment with good cultural dynamics and no discriminatory behaviours.
10.5 Communication and engagement	Conformance	The Entity has established a Communication Management and Control Procedure for internal and external communication methods. The Entity has established communication channels, for example, suggestion boxes and hotlines. Management communicates directly to employees on matters concerning their vital interests. The Code of Conduct includes a non-retaliation Policy. Interviews undertaken during the Audit confirmed that employees are aware of these communication channels and do not fear retaliation after using them.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Prohibition of Forced Labour Management Procedure, explicitly banning Violence and Harassment. The Code of Conduct outlines the Entity's responsibility to maintain a positive work environment. Employees are required to report violations, and the Entity has clear guidelines in the Code of Conduct to protect both employees who are victims of violence and those who report it.  The Code of Conduct is available at: <a href="http://www.china-huashuo.com/cn/DownLoad/144120.html">http://www.china-huashuo.com/cn/DownLoad/144120.html</a>
10.7a-d Remuneration	Conformance	The Entity has established labour remuneration management procedures and has signed labour contracts with employees. The sampled employees can provide legal and valid labour contracts and onboarding documents.  During the Audit, it was found that employee wage payments comply with local regulations, all exceeding the local minimum wage standard. Employee overtime pay is settled in accordance with legal requirements. Wages are paid monthly via bank transfer, and payments are made in advance if the payday falls on a public holiday. Payroll records and bank statements are provided for verification.
10.8a-c Working Time	Major Non- Conformance	The Entity has established working hour management procedures, which stipulate that employees should work in accordance with regulatory standards and work Overtime voluntarily. A random check of attendance records undertaken during the Audit identified that the

CRITERION	RATING	COMMENT		
		Overtime hours of the Entity's employees exceeded applicable legal requirements.		
10.9a-b Informing Workers of Rights	Conformance	When employees are hired, the Entity provides them with an employee handbook that includes salary and benefits, working hours, Overtime, attendance, absenteeism, holidays, communication procedures, disciplinary norms, and appeal processes.  The Entity's Code of Conduct outlines the legitimate rights and interests of employees, and the Entity protects employees in exercising their legal rights. The Entity supports employees' Freedom of Association and Collective Bargaining and encourages employees to participate voluntarily in Trade Unions.		
11. OCCUPATIONAL HEALTH A	11. OCCUPATIONAL HEALTH AND SAFETY			
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001 certified Occupational Health and Safety (OH&S) Management System. The certification has been verified to confirm that the certificate remains valid and within its validity period, supported by mature management system documents.  The Entity has conducted surveillance audits, internal audits, and management reviews in accordance with the implementation requirements of the management system, demonstrating a sound operational status.		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented internal audits and established regular management reviews in accordance with the requirements of the management system.  The Entity annually assesses OH&S risks, formulates corresponding measures, and establishes emergency response plans.  The Entity has established Management System objectives and publicly disclosed the achievement status of performance, available at: <a href="http://www.china-huashuo.com/cn/DownLoad/152872.html">http://www.china-huashuo.com/cn/DownLoad/152872.html</a>		
11.2 Employee engagement on Health and Safety	Conformance	The Entity summarises and reports its OH&S performance through annual internal audits and management review meetings. Health and Safety issues are deliberated, and corresponding measures are formulated through weekly meetings and monthly safety meetings. Meeting records are provided at the Audit.  The Entity has appointed a safety supervisor and safety team members to be responsible for implementing these measures and confirming the results.		

### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

REVISION	DATE	NOTES
0	30 August 2024	Certification Audit - Provisional Certification
1	18 September 2024	Correction to the Certification Scope and removal of the supply chain activity 'Material Conversion'
2	20 August 2025	Surveillance Audit - Provisional Certification