

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## ZOUPING XINSANYUAN ALUMINIUM CO., LTD. & SHANDONG LONGKOU SANYUAN ALUMINIUM CO., LTD.

CERTIFICATE  
NUMBER

276

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

SGS-CSTC  
STANDARDS  
TECHNICAL  
SERVICES

DATE OF ISSUE

10 JULY 2023

DATE OF EXPIRY

7 MAY 2026

CERTIFIED SINCE

8 MAY 2023

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing an authorized official of the Aluminium Stewardship Initiative.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)*

### CERTIFICATION SCOPE

Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).

# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

MEMBER NAME	Sanyuan Aluminium Co., Ltd.
ENTITY NAME	Zouping Xinsanyuan Aluminium Co., Ltd. & Shandong Longkou Sanyuan Aluminium Co., Ltd.
CERTIFICATION SCOPE	Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (21 – 24 November 2022)</li><li>Surveillance Audit (4 – 6 November 2024)</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>21 – 24 November 2022 (Initial Certification Audit)</li><li>4 – 6 November 2024 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>1 April 2023</li><li>23 November 2024</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (27 – 30 March 2023)</u></p> <p>The audit scope includes Zouping Xinsanyuan Aluminium Co., Ltd.in Binzhou, Shandong Province, China and Shandong Longkou Sanyuan Aluminium Co., Ltd. in Yantai, Shandong Province, China.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (4 – 6 November 2024)</u></p> <p>The audit scope includes Zouping Xinsanyuan Aluminium Co., Ltd.in Binzhou, Shandong Province, China and Shandong Longkou Sanyuan Aluminium Co., Ltd. in Yantai, Shandong Province, China.</p>

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Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

8 May 2023 – 7 May 2026

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

7 May 2026

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CERTIFICATE  
NUMBER

276

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established Compliance Management Procedure (SY-QP-038), which stipulated annually identification and compliance evaluation of product quality, environment, occupational health &amp; safety, food safety, human rights and social legals and regulations. Verified Compliance Evaluation Report of 2024 was uploaded on the entity's internal Knowledge System Platform and browed by all the staff. The Compliance Disclosure please refer to:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1620700652103913472/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E5%90%88%E8%A7%84%E7%BB%8F%E8%90%A5%E6%8A%AB%E9%9C%B2.pdf">http://www.sy-aluminium.com/viewfilebizce/1620700652103913472/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E5%90%88%E8%A7%84%E7%BB%8F%E8%90%A5%E6%8A%AB%E9%9C%B2.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>In accordance with the Interim Provisions on the Prohibition of Commercial Bribery (State Administration for Industry and Commerce Order No.60), the Entity has established the Employee Anti-bribery and Anti-corruption Code. Employees sign the Anti-Bribery and Anti-Corruption Declaration annually.</p> <p>The Entity has an evaluation process for positions at high risk of Corruption and Bribery, including sales, procurement, human resources, external inspection and testing, and has formulated actions to address the risk. Gifts and entertainment are recorded. The Supplier Survey Report informs contact details for complaints. Anti-bribery and anti-corruption code of conduct has been disclosed on:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992116379172864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%20ESG%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992116379172864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%20ESG%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf</a></p>
1.3 Code of Conduct	Conformance	<p>The Entity has established the Environmental, Social, and Governance (ESG) Code of Conduct, which is signed and issued by the General Manager and addresses ethics, labour and Human Rights, occupational health and safety, environment, Management Systems, prohibition of conflict minerals and anti-Corruption. The Entity communicates the ESG Code of Conduct with employees through the labour contract, employee manual and other channels. Employees have been given training on the Code. The Code has been disclosed on the website, please refer to:</p>

CRITERION	RATING	COMMENT
		<a href="http://www.sy-aluminium.com/viewfilebizce/1852992116379172864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%20ESG%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992116379172864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%20ESG%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented Environmental, Social and Governance (ESG) Policies including the Quality and Food Safety Policy; Environmental and Energy Management Policy; Occupational Health and Safety Policy; Labour Rights and Business Ethics Policy; and Responsible Procurement Policy, available at:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's Policies are endorsed by the General Manager who has signed the Management System Manual. Policies are reviewed for adequacy and suitability during the annual Management System review.</p> <p>ESG policy in the management review every year, please refer to:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a></p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has published its ESG Policies on the website:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a></p> <p>The Entity communicates the implications of the Policies with key customers and major suppliers. Overseas customers are communicated with on relevant policies. The ESG Policy is communicated through controlled documents, and the General Management Policy is displayed on bulletin boards. The Entity communicates the Policies internally as confirmed during interviews.</p>
2.2 Leadership	Conformance	<p>The Entity has nominated the Vice General Manager as the Management Representative. The Vice General Manager has responsibility for EHS, social responsibility</p>

CRITERION	RATING	COMMENT
		and the ASI Management System on behalf of the General Manager. A clear description of the responsibilities associated with the role is outlined.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an integrated Management System. The Sandong Longkou Sanyuan Aluminium Co., Ltd. site has obtained ISO 9001, ISO 14001 and ISO 45001 certifications for its Management Systems.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established a Social Management System in accordance with SA8000 standards, issued a Management Manual and guidelines, observes the ILO Convention (29, 105, 87, 98, 100, 111, 135, 138, 146, 155, 164 and 177) and the Global Declaration of Human Rights and Convention on the Rights of the Child; and established the Management Procedure of Employee Rights and the Communication Management Procedure.
2.4 Responsible Sourcing	Conformance	The Entity has formulated a responsible procurement policy. The policy has been disclosed on the official website, please refer to: <a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a>
2.5 Impact Assessments	Conformance	The Entity has established an 'Impact Assessment Management Procedure' that requires Impact Assessments to address environmental, social, cultural and Human Rights aspects for New Projects or Major Changes. The Entity has undertaken Impact Assessments for a production line expansion (in 2019) and a new Aluminium packaging material production line (commenced 2017), available at: <a href="http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296">http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1620699572095799296</a> and <a href="http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344">http://www.sy-aluminium.com/npublic/opdfjs/web/viewer.html?u=1615248152558649344</a> Following the establishment of the ASI Code of Conduct, the Entity has since conducted Due Diligence on social responsibility which addressed Human Rights and the evaluation results are available in the Social Responsibility Report: <a href="http://www.sy-">http://www.sy-</a>

CRITERION	RATING	COMMENT
		<a href="http://aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629783036125184">aluminium.com/npublic/opdfjs/web/viewer.html?u=1620629783036125184</a>
2.6 Emergency Response Plan	Conformance	<p>The Entity's sites have established contingency plans for various emergency scenarios, and these are filed with the relevant local environmental protection bureaus. Drills are conducted and evaluated to improve the plans.</p> <p>The Entity collects contact information of surrounding businesses for emergency communication and coordination.</p>
2.7 Mergers and Acquisitions	Conformance	The Entity has established the 'Company Merger, Acquisition, Capital Increase, Capital Reduction, Closure, Dissolution and Liquidation Regulations' procedure. To date, no mergers or acquisitions have occurred.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established the 'Company Merger, Acquisition, Capital Increase, Capital Reduction, Closure, Dissolution and Liquidation Regulations' procedure. To date, no closure, decommissioning or divestment has occurred.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>Sustainability Development Report of 2023, disclosed on website:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has established the 'Company Information Disclosure Management System', which stipulates the disclosure requirements for mandatory regulatory disclosures, such as violations, responsibilities, payments to the government, leakage and waste treatment. Since the implementation of the ASI Code of Conduct, there have been no major incidents involving fines, judgments, penalties and non-economic sanctions.</p> <p>Sustainability Development Report of 2023, disclosed on website:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a></p>

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	In accordance with the Interim Provisions on the Prohibition of Commercial Bribery (State Administration for Industry and Commerce Order No.60), the Entity has established the 'Code of Anti-bribery and Anti-corruption Conduct for Employees' to control Bribery and other Corruption behaviours. The Entity undertakes an independent audit of all payments. Currently, the payments to government are for taxes, there are no other non-tax payments.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established the 'Company Information Disclosure Management System', which stipulates the Complaints Resolution Mechanism and process. To date, the Entity has not received any complaints from employees, suppliers and other interested parties. Community complaints have been received through the local environmental protection bureau regarding odour emissions. The Entity has actively cooperated with the Ecology and Environmental Bureau to sample and monitor the emissions which determined the Entity was not responsible.</p> <p>Training records and training evaluation forms to implement the 'Communication Management Procedure' are maintained.</p> <p>The Entity has published the complaint channel and resolution mechanism on the company's official website. Please refer to:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a></p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	<p>Shandong Longkou Sanyuan Aluminum Co., Ltd. has published the Environmental Life Cycle Assessment (LCA) Report on its official website:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</a></p> <p>Zouping Xinsanyuan Aluminum Co., Ltd. also has published the LCA report on website:</p> <p><a href="http://www.sy-">http://www.sy-</a></p>



CRITERION	RATING	COMMENT
		<a href="http://www.sy-aluminium.com/viewfilebizce/1852992679417229312/%E9%82%B9%E5%B9%B3%E6%96%B0%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf">aluminium.com/viewfilebizce/1852992679417229312/%E9%82%B9%E5%B9%B3%E6%96%B0%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</a> Both reports had the list of major production lines using aluminium, referring to the ISO14044:2006 standard method. Some problems exist in the entire life cycle assessment report of the aluminium strip/aluminium sheet coating process provided by the entity. The scrap aluminium utilization plan was published: <a href="http://www.sy-aluminium.com/news_detalis/22.html">http://www.sy-aluminium.com/news_detalis/22.html</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Minor Non-Conformance	Some customers (such as BALL, CROWN) required the Entity to provide LCA report on its aluminium products. The entity has sent the LCA report to its customer by email. And the customer could also obtain the LCA report from the entity's website as below: <a href="http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed LCAs that refer to the ISO 14044:2006 methodology and includes the system boundaries from Bauxite Mining to the door of the customer plant. The LCA reports are available at: <a href="http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991961951014912/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%83%E7%8E%AF%E5%A2%83%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</a>
4.2 Product design	Conformance	The Entity has established a new product/new customer certification and testing process, which clearly states that clear goals should be included in the product design/testing process to improve sustainability. The targets for the Zouping and Longkou sites were verified.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity provides a scrap aluminium management system to regulate the management of scrap aluminium/materials, and classifies, verifies, and disposes of them according to aluminium alloys to ensure the safety and recycling of scrap aluminium. According to the scrap aluminium use plan and measures, the scrap aluminium recovery rate generated by the entity's production process reaches 100%. The planned recovery rate for post-consumer can lid

CRITERION	RATING	COMMENT
		materials is 8% in 2025 and 15% in 2030; the planned recovery rate for pull ring materials is 25% in 2025 and 40% in 2030. As for process waste recovered from third parties, they are classified according to the alloy composition of aluminium and downgraded for use, that is, they are directly returned to the supplier to be remelted into aluminium water in a double-chamber furnace to be made into recycled aluminium plates and strips for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established operating instructions for the warehousing, packaging and storage classification of scrap aluminium, and requires that materials be labelled separately (aluminium and coloured aluminium) and stored.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has provided plans and measures for the use of scrap aluminium, covering the recycling strategies for can lids and ring pulls. For details, please refer to the measures for the recycling and use of scrap aluminium. In addition, since the products produced by the entity are used for food filling, food safety requirements are relatively strict. The composition of post-consumer scrap aluminium (UBC) is complex and there is no guarantee whether there are pollutants, which may cause excessive heavy metal content. In order to comply with food safety regulations, the main source of recycled aluminium currently used by the entity is pre-consumer scrap aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	There is a lack of evidence that the company has taken plans and actions to promote and support the recycling of post-consumer aluminium scrap, or has made further efforts to promote the construction of a social aluminium scrap (post-consumer aluminium) recycling system and increase the recycling rate, such as cooperating with local, regional or national collection and recycling organizations, participating in public welfare activities, etc.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity has implemented a 'GHG Controlling and Management Procedure', which requires annual analysis of data and Greenhouse Gases (GHG) emissions reporting as per ISO14064-1:2018. But the Entity's GHG inventory report has not been verified by a third party, and the GHG inventory report does not include the Company's substantial emission sources, namely the GHG emission sources of purchased aluminium raw materials.

CRITERION	RATING	COMMENT
		<p>The Entity has separately accounted for and publicly disclosed annual Material GHG emissions and energy use by source with its website:  <a href="http://www.sy-aluminium.com/viewfilebizce/1852991906490888192/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E7%9B%98%E6%9F%A5%E6%8A%A5%E5%91%8A%E4%B9%A6.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991906490888192/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E7%9B%98%E6%9F%A5%E6%8A%A5%E5%91%8A%E4%B9%A6.pdf</a></p> <p>The reports include the methodology for determining Direct and Indirect (Scope 1, 2 and 3) GHG emissions.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has reported its GHG emissions reduction strategies in the GHG Inventory Report, Chapter 7.1:  <a href="http://www.sy-aluminium.com/viewfilebizce/1852991906490888192/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E7%9B%98%E6%9F%A5%E6%8A%A5%E5%91%8A%E4%B9%A6.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991906490888192/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E7%9B%98%E6%9F%A5%E6%8A%A5%E5%91%8A%E4%B9%A6.pdf</a></p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has quantified and reported Emissions to Air that have adverse effects on humans or the environment in the site-specific Environmental Impact Assessment (EIA) Report.</p> <p>The Entity has established an air emissions management plan, which addresses the installation of waste gas treatment and a monitoring plan. The monitoring plan is in accordance with the Pollutant Discharge Permit.</p> <p>The Pollutant Discharge Permit Implementation Report (Annual Report) has been disclosed on:  <a href="http://www.sy-aluminium.com/news_detalis/14.html">http://www.sy-aluminium.com/news_detalis/14.html</a>  and  <a href="http://www.sy-aluminium.com/news_detalis/21.html">http://www.sy-aluminium.com/news_detalis/21.html</a></p>
6.2 Discharges to Water	Conformance	The Entity has quantified and reported Discharges to Water that have adverse effects on humans or the environment in the site-specific Environmental Impact

CRITERION	RATING	COMMENT
		Assessment (EIA) Report. <a href="http://www.sy-aluminium.com/news_detail/14.html">http://www.sy-aluminium.com/news_detail/14.html</a> and <a href="http://www.sy-aluminium.com/news_detail/21.html">http://www.sy-aluminium.com/news_detail/21.html</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has established an Emergency Plan for Environmental Emergencies at the Longkou and Zouping sites, based on the evaluation of the risk where Spills and Leakages may contaminate air, water and soil. The Entity has identified the risk of potential Spills and Leakages from untreated wastewater, VOCs from the painting process and natural gas.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has installed combustible gas (e.g., CH <sub>4</sub> , xylene) detection alarms at its production site, along the gas pipe and painting warehouse. Calibration certificates of the detection alarm are retained. Neighbours have been informed about the emergency plan and the neighbouring company attended the emergency plan review meeting.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has disclosed in its 2023 ESG report that the entity did not have any leaks in 2023. Please refer to: <a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a>
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has established the 'Emergency Preparing and Response Management Procedure', to address the reporting requirement for emergencies and the 'Information Disclosure Management Regulation' stipulates the disclosure of Spill and Leakages events. The Emergency Plan for Environmental Emergencies addresses the potential impact of Spills. To date, no significant Spills or Leakages have occurred.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established a waste management system, which stipulates collection, transportation and disposal measures. Hazardous Waste is transferred to and disposed of by local government qualified companies. Other industrial solid waste, such as plastic and wood is sold to recycling companies.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a procedure for Hazardous Waste and Non-Hazardous Waste. An annual summary of Non-Hazardous Waste disposal is available in the Management Review Report, page 5:

CRITERION	RATING	COMMENT
		<a href="http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620700460506243072">http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620700460506243072</a> The quantity of disposed Hazardous Waste in 2021 is disclosed on the website at: <a href="http://www.sy-aluminium.com/news/23.html">http://www.sy-aluminium.com/news/23.html</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has established a procedure to map the Entity's water consumption and withdrawal by quantity

CRITERION	RATING	COMMENT
		and source. The Entity does not belong to the key monitored water use unit. The enterprise water risk is low.
7.1b Water assessment (risk assessment)	Conformance	Both the production and domestic wastewater are treated by the Entity's wastewater treatment station before discharge to the local Yongwen River Wastewater Treatment Plant. The water usage status were disclosed on ESG report, please refer to: <a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a>
7.2a Water management (management plans)	Minor Non-Conformance	The Entity has formulated the "Water, Electricity and Gas Management System", of which 4.1.6 stipulates that the entity shall calculate the water consumption of the year once a year, draw a water balance chart, and publicize it on the website. But has not formulated a water resources management plan to achieve the set management goals. The balance chart has been disclosed on the official website: <a href="http://www.sy-aluminium.com/viewfilebizce/1852991848914522112/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B0%B4%E5%B9%B3%E8%A1%A1%E5%9B%BE.pdf">http://www.sy-aluminium.com/viewfilebizce/1852991848914522112/%E9%BE%99%E5%8F%A3%E4%B8%89%E5%85%832023%E5%B9%B4%E6%B0%B4%E5%B9%B3%E8%A1%A1%E5%9B%BE.pdf</a>
7.2b Water management (monitoring)	Conformance	Whilst the water-related risks have been assessed as low, the Entity has established a procedure that stipulates the regular monitoring of water consumption and performance of the water reduction target.
7.3 Disclosure of water usage and risks	Conformance	The Entity has assessed its water usage and water-related risks including potential impact on local protected water resource areas. The ESG report has been disclosed the water related risks and refer to: <a href="http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf">http://www.sy-aluminium.com/viewfilebizce/1852992185374355456/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%902023%E5%B9%B4%E5%BA%A6%E5%8F%AF%E6%8C%81%E7%BB%AD%E6%80%A7%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8A.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity's sites are located within industrial zones developed by the local governments. The Entity has

CRITERION	RATING	COMMENT
		used qualified third parties to undertake Environmental Impact Assessments (EIA) as part of the site planning and for subsequent expansion projects at the Langkou and Zouping sites. The risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence is included in the EIA, which determined there is no protected flora or significant fauna in the area and the sites are not within ecological preservation areas. Based on the EIA, the Entity has established plans to monitor the Emissions to Air and Discharges to Water.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has assessed the risks and materiality of impacts on Biodiversity through various EIA reports developed during planning and expansion projects. The main risk to Biodiversity is the impact on biological habitats caused by air pollution and water pollution. The Entity has established the 'Biodiversity Protection Management Regulation', which requires a Biodiversity Action Plan and annual reporting. The monitoring reports of air emissions and discharge of wastewater confirm that control measures are executed and effective.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established the 'Biodiversity Protection Management Regulation', which requires a Biodiversity Action Plan and annual reporting. Based on the EIA, which determined the impacts on Biodiversity, the Entity has established plans to monitor the Emissions to Air and Discharges to Water.
8.2c Biodiversity management (reporting)	Conformance	The Entity has established the 'Biodiversity Protection Management Regulation', which requires the disclosure of an annual Biodiversity Assessment Report: Longkou: <a href="http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620698827853037568">http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620698827853037568</a> Zouping: <a href="http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620629664807682048">http://www.sy-aluminium.com/npublic/opdfs/web/viewer.html?u=1620629664807682048</a>
8.3 Alien Species	Conformance	The Entity has identified the risk of the introduction of Alien Species as low. Staff are trained on Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has established a commitment within its corporate policies to respect Human Rights. Training on the policies is carried out, posted on-site and made available on the Entity's website:</p> <p><a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a></p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has established a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Due Diligence process covers the supply chain. The Entity has a Human Rights Due Diligence Report.</p> <p>The Entity has a 'whistleblower' hotline (Longkou on 0535-3127855 and Zouping on 0543-4850708) and email ID (sdlsylc@163.com) listed on the website: <a href="http://www.sy-aluminium.com/contact.html">http://www.sy-aluminium.com/contact.html</a></p> <p>So far, the Entity has not committed any human rights violations.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has established the 'Human Rights Due Diligence Procedure' and 'Communication and Participation Management Procedure', which together ensure remediation through legitimate processes where actual Human Rights impacts are identified.</p> <p>The Entity establishes and publishes a complaints/grievance channel to Stakeholders. To date, the Entity has not caused or contributed to adverse Human Rights impacts, as such, no remedy is needed.</p>
9.2 Women's Rights	Conformance	<p>The Entity has established a 'Women's Rights Management Procedure' that protects women's rights. The Entity has established a female worker committee. Interviews with Workers confirmed women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.</p>
9.3 Indigenous Peoples	Conformance	Whilst there are no Indigenous Peoples within the



CRITERION	RATING	COMMENT
		industrial zones of the Longkou and Zouping sites, the Entity has established and implemented the 'Indigenous Peoples Management Procedure'.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	Whilst there are no Indigenous Peoples within the industrial zones of the Longkou and Zouping sites, the Entity has established the 'Indigenous Peoples Protection and Free, Prior, and Informed Consent Procedure'. This procedure defines that the Entity will consult and cooperate in good faith with Indigenous Peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, where New Projects or Major Changes to existing projects may have significant impacts on the Indigenous Peoples associated culturally with and living on the relevant lands.
9.5 Cultural and sacred heritage	Conformance	Whilst the Entity is located within industrial park locations and there are no cultural or sacred heritage sites or values, the Entity has defined a 'Local Community Management Procedure' to protect cultural and sacred heritage.
9.6a Resettlements (avoid or minimise)	Conformance	Whilst the Entity is located within industrial park locations and no resettlement was required; the Entity has established a 'Indigenous People management procedure'.
9.6b Resettlements (where unavoidable)	Conformance	Whilst the Entity is located within industrial park locations and no resettlement was required, the Entity has established a 'Resettlements Management Procedure'.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established a 'Local Communities Management Procedure' that requires the Entity to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity is located within industrial park locations planned by local governments. To date, no complaints from Local Communities have been received.
9.7b Local Communities (impacts)	Conformance	The Entity has established a 'Local Communities Management Procedure' that requires the Entity to take appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities when necessary.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity is committed to exploring with the Local Communities opportunities to respect and support their livelihoods. The Entity employs people from the Local Communities, and the majority of employees are from the Local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment in the Responsible Sourcing Policy to not use conflict minerals and communicates this through the Aluminium value chain.
9.9 Security practice	Conformance	The Entity has established a 'Security Practice Management Procedure', which requires the Entity and security providers to respect Human Rights. Security guards had been trained on respecting Human Rights.
10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity, as they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity, as they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Freedom of Association and the right to Collective Bargaining within Applicable Law. Worker interviews confirmed that Workers' representatives can deal with the Workers' concerns with management. The Entity maintains records of Labour Union meetings.
10.2a Child Labour (minimum age)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour. Staff in the Human Resources Department know the requirements. The Entity does not use Child Labour, and the youngest employee is 23 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour and prohibition of young Workers (under 18 years) involved in dangerous or harmful work or Overtime. The Entity does not use Child Labour, and the youngest employee is 23 years old.
10.2c Child Labour (worst forms)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Child Labour and prohibition of young Workers (under 18 years) involved in dangerous or

CRITERION	RATING	COMMENT
		harmful work or Overtime. The Entity does not use Child Labour, and the youngest employee is 23 years old.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. All Workers have signed a labour contract which is filed with the local government. The Entity does not engage in nor support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. All employees are hired directly. The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. No Worker is required to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity doesn't hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. The Entity does not retain Workers' original documents, only copies are kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the

CRITERION	RATING	COMMENT
		prohibition of Forced Labour. Worker interviews confirmed there is no Forced Labour. Workers can terminate their employment with a specific notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the labour contract law: 30 days in advance or three days in the period of probation.
10.4 Non-Discrimination	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the Entity shall ensure equal opportunities and not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, in line with ILO Conventions C100 and C111. Worker interviews confirmed there is no Discrimination. To date, no case of Discrimination has been received.
10.5 Communication and engagement	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the implementation of Freedom of Association. Worker interviews confirmed that Workers' representatives can deal with the Workers' concerns with management.
10.6 Disciplinary practices	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the Entity shall neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity's disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved.
10.7a Remuneration (living wage)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines that the total Remuneration payments should meet the Workers' basic needs. All Workers are enrolled in the mandatory social insurance scheme. The lowest Worker wages are meet or above the minimum wage. A high-temperature allowance is paid according to position/role.
10.7b Remuneration (method of payment)	Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the requirement for wage payments to be timely, in legal tender and fully documented. Wages are paid on the 28 <sup>th</sup> of every month, as

CRITERION	RATING	COMMENT
		confirmed during Worker interviews and review of the signed remuneration sheet.
10.8 Working Time	Minor Non-Conformance	The Entity has established the 'Employee Rights and Interests Management Procedure', which defines the Working Time. Employee records are maintained by the Entity to record monthly working hours, including working days, Overtime working hours, public holidays and paid annual leave. Employee monthly Overtime did not exceed Chinese labour laws (less than 36 hours monthly). However, it was found that some Workers had worked more than 36 hours Overtime per month, which does not meet legal requirements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System, certified to ISO 45001:2018. The documented OH&S Policy is available in the Entity's compilation of Production and Operation Policies: <a href="http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf">http://www.sy-aluminium.com/viewfilebizce/1852992455459364864/%E4%B8%89%E5%85%83%E9%93%9D%E6%9D%90%E5%85%AC%E5%8F%B8%E6%96%B9%E9%92%88(1).pdf</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an OH&S Policy that applies to Workers and Visitors. Worker interviews found that Workers are aware of the Entity's OH&S Policy.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an OH&S Policy that includes the commitment to comply with Applicable Law on Worker's health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an OH&S Policy. The Policy has been specified that employees have the right to understand the hazards and safety measures of their work and the right to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System, certified to ISO 45001:2018. Details of the certificate are available at the National Certification and Accreditation Information Public Service Platform (via certificate number CN22/00004593).
11.3 Employee engagement on health and safety	Conformance	The Entity has provided Workers with a mechanism to raise, discuss and participate in the resolution of OH&S

CRITERION	RATING	COMMENT
		issues with management, including via email, hotline and the Labour Union.
11.4 OH&S performance	Conformance	The Entity has established the indicators to monitor and evaluate its OH&S performance, such as the occupational hazard factors detection report and occupational disease physical examination report.

#### **Document Control and Version History**

Revision	Date	Notes
0	8 May 2023	Initial Certification Audit – Full Certification
1	10 July 2025	Surveillance Audit – Full Certification