

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

PanAsia Enterprises (Nanyang) Co. Ltd.

CERTIFICATE NUMBER

499

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SGS-CSTC
STANDARDS
TECHNICAL
SERVICES

DATE OF ISSUE

12 SEPTEMBER 2025

DATE OF EXPIRY

11 SEPTEMBER 2028

CERTIFIED SINCE

12 SEPTEMBER 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

CERTIFICATION SCOPE

Remelting and casting, extrusion, fabrication, powder-coating, anodising, die making, and CNC for the production of Aluminium ingots at PanAsia Enterprises (Nanyang) Co. Ltd, China.

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	PanAsialum Holdings Company Ltd
ENTITY NAME	PanAsia Enterprises (Nanyang) Co. Ltd.
CERTIFICATION SCOPE	Remelting and casting, extrusion, fabrication, powder-coating, anodising, die making, and CNC for the production of Aluminium ingots at PanAsia Enterprises (Nanyang) Co. Ltd, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">22 – 26 July 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 August 2025
AUDIT SCOPE	<p>The Audit Scope included the processes used for the production of Aluminium ingots include remelting and casting, extrusion, fabrication, powder coating, anodising, die making and CNC at PanAsia Enterprises (Nanyang) Co. Ltd, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 12 September 2025 – 11 September 2028

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 11 March 2027

CERTIFICATE NUMBER 499



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

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

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

ENTITY OVERVIEW

PanAsia Enterprises (Nanyang) Co., Ltd. (the ‘Entity’) is affiliated to PanAsia Enterprises Group, which is a high-tech enterprise listed in Hong Kong with over 30 years in Aluminium alloy manufacturing. The Entity is located at Longsheng Avenue, Nanyang Optoelectronic Industry Agglomeration Zone, in Nanyang City, Henan Province, China. It has a registered capital of 228.92 million US dollars, covering an area of 80 hectares, and currently has more than 500 employees. The Entity includes accommodation and dormitories for Workers.

The Entity has a remelting and casting workshop, two extrusion workshops, a spraying workshop, an anodising workshop, three CNC (Computer Numerical Control) precision processing workshops, a sewage treatment facility and other supporting production facilities. The Entity is capable of annually processing 160,000 tonnes of Aluminium rods, extruding 150,000 tonnes of Aluminium materials, 50,000 tonnes of Aluminium profiles and 24,000 tonnes of powder coated Aluminium materials. The CNC production equipment and intelligent mechanical hands have an annual production capacity of 30 million precision Aluminium parts.

The Entity mainly provides solutions for research and development, design, manufacturing, deep processing, packaging and distribution of Aluminium products, and specialises in the production of high-precision Aluminium alloy parts for electronic products, high-end doors and windows, architectural decoration and industrial Aluminium profiles. The main applications of the Entity’s products include electronic product accessories (such as mobile phone and computer cases, stands, etc.), photovoltaic systems (solar frames), rail transit, automotive light weighting, shipbuilding, outdoor equipment, medical equipment, doors, windows and curtain walls, municipal engineering, and general industrial profiles. The products are mainly sold to domestic and overseas markets, including the Asia-Pacific (Mainland China, Hong Kong, Singapore, and Australia), Southeast Asia, North America (Canada), Europe, and Africa.

The Entity has successively obtained ISO 9001 Quality Management System, ISO 14001 Environmental Management System, ISO 45001 Occupational Health and Safety Management System, IATF16949 Automotive Quality Management System Certification, and ISO 50001 Energy Management System certifications. The Entity has established the Henan Province Aluminium Extrusion Materials Engineering Technology Research Centre, the Henan Province Postdoctoral Practice Base, and the Nanyang City Enterprise Technology Centre.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a list of Applicable Laws, regulations and other requirements on topics including the environment, Occupational Health and Safety and Human Rights. The list has been regularly updated. Regular Compliance evaluations made by the Entity identify that the Entity complies with legal requirements. No violations are recorded against the Entity.
1.2 Anti-Corruption	Conformance	<p>The Entity has established anti-Bribery management Policy and procedures. The Complaints Mechanism, including the 'whistleblower' hotline and email addresses, is disclosed on the Entity's website: https://www.palum.com/tc/IRESGReports.aspx</p> <p>Employees have been trained and staff in all key sensitive positions have signed an anti-Bribery commitment. The Entity's Policy has been communicated with Stakeholders. No case of Bribery is recorded against the Entity: https://www.creditchina.gov.cn</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance, which is signed off by senior management. The Code of Conduct is available at: https://www.palum.com/tc/IRESGReports.aspx</p> <p>The ASI-related internal audit and management review has been undertaken annually to ensure the normal and effective operation of the Entity's Management System.</p>
CONFORMANCE		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established an environmental, social and governance Management System, including Policies endorsed by the General Manager and supported through the provision of resources. The Policies are posted on-site and communicated with employees and external Stakeholders. The Policies are reviewed annually and are available at:</p> <p>https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/ASI%E6%96%B9%E9%92%88%E6%B1%87%E7%BC%96.pdf?v=1</p>
2.2a-c Leadership	Conformance	The Entity has appointed the Vice Factory Manager as the ASI Management Representative, who has overall responsibility and authority for ensuring Conformance with the requirements of the ASI Performance Standards.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented an integrated Management System. The Entity has obtained ISO 14001:2015 certification. The Entity has implemented an internal audit and management review procedure to review its Environment, Health and Safety (EHS) Management System for improvement.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a social Management System according to the SA8000 standard to manage risks with respect to Human Rights and Labour Rights. The Entity's Social Responsibility Management Manual and supporting procedures have

CRITERION	RATING	COMMENT
		been implemented. Internal audits and management reviews have been conducted.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a Responsible Sourcing Policy, which is signed off by the General Manager. Employees are trained on the Policy. The Policy has been communicated to suppliers, and is available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/ASI%E6%96%B9%E9%92%88%E6%B1%87%E7%BC%96.pdf</p> <p>The Entity's Due Diligence management procedure has been implemented and supplier Due Diligence, including supplier audits, has been conducted.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes since the Entity joined ASI. Nonetheless, the Entity has implemented an Environmental and Social Impact Management Plan (ESIP), available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E7%8E%AF%E5%A2%83%E5%92%8C%E7%A4%BE%E4%BC%9A%E5%BD%B1%E5%93%8D%E7%AE%A1%E7%90%86%E8%AE%A1%E5%88%92.pdf</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes since the Entity joined ASI. Nonetheless, a Human Rights impact evaluation has been undertaken and the Human Rights Impact Assessment Report is available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E4%BA%BA%E6%9D%83%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf?v=2</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has prepared an Emergency Response Plan for Environmental Incidents and an Emergency Response Plan for Production Safety. The Plans, disclosed on the Entity's website, and are reviewed every three years.</p> <p>Production Safety: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%EF%BC%88%E5%8D%97%E9%98%B3%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E7%94%9F%E4%BA%A7%E5%AE%89%E5%85%A8%E4%BA%8B%E6%95%85%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%88.pdf</p> <p>Environmental Incidents: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E7%AA%81%E5%8F%91%E7%8E%AF%E5%A2%83%E4%BA%8B%E4%BB%B6%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%88.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established and implemented a suspended operations management regulation and a Business resilience plan. The Entity's There have been no changes to the Business or control gaps identified, however the Entity has a process in place to review the plan every three years.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established a mergers and acquisitions regulation to specify procedures for the review of environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. To date, no mergers or acquisitions have occurred.</p>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for the review of environmental, social and governance issues in the planning process for closure, decommissioning and divestment. To date, no closure, decommissioning or divestment has occurred.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared and disclosed the 2024 Environmental, Social and Governance (ESG) Report, available at: https://palum.com/pdf/ESG2024.pdf
3.2 Non-compliance and Liabilities	Conformance	There were no fines, judgments, penalties or non-economic sanctions in 2024 for the Entity, as confirmed on the relevant government website: https://www.creditchina.gov.cn The Entity disclosed the status in its ESG Report, pages 63, 70, 75: https://palum.com/pdf/ESG2024.pdf
3.3a-c Payments to Governments	Conformance	The Entity is prohibited from making payments to government officials, except those that are required to comply with Applicable Laws and regulations.. As a wholly owned subsidiary of a listed company, the Entity's financial audits are conducted by an independent Third Party, which discloses the amount paid to the government, including taxes payable and social insurance payments. The Entity has disclosed all payments to government in its 2024 Government Expenditures report, available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/2024%E5%B9%B4%E5%BA%A6%E5%90%91%E6%94%BF%E5%BA%9C%E6%94%AF%E5%87%BA%E6%AC%BE%E9%A1%B9%E8%AF%B4%E6%98%8E.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a procedure to manage complaints from internal and external Stakeholders, received via email and a dedicated phone number. The Entity discloses its complaints channels, including a complaints hotline, email publicised in workshops, dormitories, and the factory gates and the village committee publicity boards. Further information is available at: https://www.palum.com/tc/IRESGReports.aspx
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's Product Life Cycle Assessment (LCA) report provides cradle-to gate information on its Aluminium Products. The assessment report covers all production processes and major production lines.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity's Life Cycle Assessment (LCA) report provides cradle-to gate information on its Aluminium Products. The LCA report is disclosed at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E4%BA%A7%E5%93%81%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E7%8E%AF%E5%A2%83%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf?v=20250729 However, the LCA report is incomplete and does not analyse the environmental impacts during the raw material acquisition stage, and the report only describes that 'the environmental impact mainly comes from the consumption of upstream raw materials and the

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		energy consumption in the production stage', it does not analyse which raw materials have a major environmental impact.
4.2 Product Design	Conformance	The Entity has established procedures related to the maximum use of waste materials at the Product design stage. The efficiency of equipment use matches the Product to achieve the optimal design, reducing the generation of waste materials and energy consumption. Resource consumption efficiency design has been implemented to reduce CO ₂ -related emissions.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a Scrap reduction plan to minimise Aluminium Process Scrap, with a target to recycle 100% of Process Scrap. Targets to reduce Scrap are well implemented. Aluminium Process Scrap is classified according to the grades for easy reuse. All internal Aluminium Process Scrap is recycled on site.
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 undertakes efforts to increase recycling rates in their respective markets for Products containing Aluminium, including having organised an Aluminium recycling promotion in the community, participated in the Henan Nonferrous Metals Association's technical exchanges and provided technical support for waste recycling with a scrap collection and recycling company.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established a documented procedure for determining the Entity's Material Greenhouse Gas (GHG) emissions and energy use by source. The GHG emissions calculation and verification are undertaken by a qualified Third Party. The methodology for determining Direct and Indirect GHG Emissions is clear. The Entity's energy and GHG emissions data are disclosed in the 2024 GHG Verification Statement:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/ISO14064%E6%A0%B8%E6%9F%A5%E5%A3%B0%E6%98%8E%E4%B9%A6-%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%EF%BC%88%E5%8D%97%E9%98%B3%EF%BC%89.pdf</p> <p>However, the emissions data for the purchased Primary Aluminium were obtained from SimaPro software rather than the upstream supply chain.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan including a GHG Emissions Reduction Pathway that uses the ASI endorsed methodology to ensure alignment with a 1.5°C warming scenario. The baseline for GHG emissions reduction is 2023, and both Direct and Indirect GHG emissions are addressed. The GHG Emissions Reduction Plan is available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E7%9B%AE%E6%A0%87%E5%92%8C%E8%AE%A1%E5%88%92(%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%E5%8D%97%E9%98%B3%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8).pdf?v=3</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established GHG Emissions Reduction Pathways for Scopes 1 and 2 emissions and Scope 3, which includes annual emissions intensity targets to 2028 and through to 2050.</p> <p>The GHG Emissions Reduction Plan includes initiatives related to 'low-carbon' raw materials, installation of renewable energy capacity and energy efficiency. Implementation of the Plan is reviewed annually. The Entity's GHG Emissions Targets and Implementation Plan is disclosed at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E7%9B%AE%E6%A0%87%E5%92%8C%E8%AE%A1%E5%88%92(%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%E5%8D%97%E9%98%B3%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8).pdf?v=3</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and implemented an energy Management System for energy and carbon reductions. It has also established procedures to specify the requirements for inventory and verification of its GHG emissions. Energy monitoring is conducted every month. The Entity's GHG Emissions Reduction Plan has been developed and implemented, and is reviewed annually.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has quantified and annually discloses its Material Emissions to Air from its activities, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E6%8E%92%E6%94%BE%E5%85%AC%E7%A4%BA%E6%80%BB%E7%BB%93.pdf</p> <p>The Entity has established an air pollution reduction plan to minimise exposure to, and impacts from, Emissions to Air. Further information is available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E8%8D%A3%E9%98%B3%E5%AE%9E%E4%B8%9A%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has quantified and annually discloses its Material Discharges to Water from its activities, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E6%8E%92%E6%94%BE%E5%85%AC%E7%A4%BA%E6%80%BB%E7%BB%93.pdf</p> <p>The Entity has established a water pollution reduction plan to minimise exposure to, and impacts from, Discharges to Water. Further information is available at:</p>

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		https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92.pdf
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has established a leakage management system to assess Spills and Leakages risks on an annual basis. The risk assessment has been conducted and the Spills and Leakages Impact Assessment Report is disclosed at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B3%84%E6%BC%8F%E5%92%8C%E6%B8%97%E6%BC%8F%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</p> <p>The Entity's Spills and Leakages Management Plan has been implemented and disclosed on its website, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B3%84%E6%BC%8F%E5%92%8C%E6%B8%97%E6%BC%8F%E7%AE%A1%E7%90%86%E8%AE%A1%E5%88%92.pdf</p> <p>However, Aluminium Scrap generated from the finishing workshop is stored on the ground and leakage of cutting fluid was observed during the Audit, with no measures in place to prevent leakage from Aluminium Scrap.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established a leakage management system to assess Spills and Leakages risks on an annual basis. The risk assessment has been conducted and the Spills and Leakages Impact Assessment Report is disclosed at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B3%84%E6%BC%8F%E5%92%8C%E6%B8%97%E6%BC%8F%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</p> <p>The Entity's Spills and Leakages Management Plan has been implemented and disclosed on its website, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E6%B3%84%E6%BC%8F%E5%92%8C%E6%B8%97%E6%BC%8F%E7%AE%A1%E7%90%86%E8%AE%A1%E5%88%92.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity maintains an inventory to identify the types of solid Waste generated and the methods of treatment, and has undertaken an Impact Assessment that analyses impacts and defines the management measures for various types of solid Waste. The Entity has disclosed its Waste data in the Summary of Solid Waste Disposal report, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E5%9B%BA%E4%BD%93%E5%BA%9F%E5%BC%83%E7%89%A9%E5%A4%84%E7%90%86%E5%85%AC%E7%A4%BA%E6%80%BB%E7%BB%93.pdf</p> <p>The Entity has prepared a Solid Waste Mitigation Strategic Plan, available at:</p> <p>https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E5%9B%BA%E4%BD%93%E5%BA%9F%E7%89%A9%E5%87%8F%E7%BC%93%E6%88%98%E7%95%A5%E8%A7%84%E5%88%92.pdf</p>
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.

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6.8a-d Dross	Conformance	The Entity has a facility for separating the Aluminium and Dross from the Aluminium ash slag to improve the use efficiency of Dross. Secondary Aluminium Dross is sent to a dedicated warehouse for storage and labelling. Dross is legally transferred and disposed of by a qualified agency as 'dangerous wastes'. Transfer records are maintained. No Dross residues are landfilled. All Dross residues are reused.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has mapped its water capture and use by source and type. All water is supplied by the municipal water supply system. The water resource consumption assessment prepared by the Entity indicates the domestic water consumption is within its limits, and the industrial water is discharged after treatment. The Entity has evaluated and annually disclosed the risks related to water in the Entity's Area of Influence, which were determined as low.</p> <p>The Entity's water consumption is disclosed at: https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E5%B9%B4%E5%BA%A6%E6%B0%B4%E8%B5%84%E6%BA%90%E5%88%A9%E7%94%A8%E7%AE%A1%E7%90%86%E6%8A%A5%E5%91%8A%E2%80%8B.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risks were determined as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has implemented a Biodiversity protection system, which specifies a Biodiversity Protection Policy. The Entity has assessed the risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The report identifies that land use and activities within the Entity's sphere of influence have a low risk of impact on Biodiversity. Further information is available in the Biodiversity and Ecosystem Services Assessment Report: https://www.palum.com/pdf/%E7%8E%AF%E5%A2%83/%E7%94%9F%E7%89%A9%E5%A4%9A%E6%A0%B7%E6%80%A7%E5%92%8C%E7%94%9F%E6%80%81%E7%B3%BB%E7%BB%9F%E6%9C%8D%E5%8A%A1%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified and the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.4 Alien Species	Conformance	The Entity has developed an Alien Species Risk Assessment Report and actively prevents the accidental or intentional introduction of Alien

CRITERION	RATING	COMMENT
		Species that could have significant adverse impacts on Biodiversity. No Alien Species have been introduced.
8.5a-b Commitment to “No Go” in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, as it is not in proximity to any World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is not in proximity to any 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	<p>The Entity has established a Human Rights Policy, which is communicated to employees by training, displayed on-site and disclosed on the Entity's website: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E4%BA%BA%E6%9D%83%E6%96%B9%E9%92%88%E6%89%BF%E8%AF%BA%E4%B9%A6.pdf</p> <p>The Entity reviews the Human Rights Policy annually.</p> <p>The Entity has established a Human Rights Due Diligence Management Procedure, which defines how to identify any Material legacy impacts in the Entity's own operations and business relationships established through products or services. A Human Rights Impact Assessment Report has been prepared, which includes Due Diligence on internal Human Rights, affected peoples and suppliers, available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E4%BA%BA%E6%9D%83%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf?v=2</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established procedures to protect women's rights and promote gender equality and has taken measures to promote these rights and interests.</p> <p>Female Workers have the right to pregnancy, maternity and feeding leave with payment, and infant feeding rooms are provided. Related training has been undertaken for female Workers. The Grievance and Complaints Mechanism is in place for female Workers to raise any complaints.</p> <p>The Entity's gender equality and women's rights program is reviewed annually and/or in the event of any changes or control deficiencies. The Entity publicly discloses the results of the measures taken to protect the rights and interests of women employees in its 2024 Summary Report on Promoting Gender Equality and Empowering Women: https://www.palum.com/pdf/%E7%A4%BE%E4%BC%9A/%E4%BF%83%E8%BF%9B%E4%B8%A4%E6%80%A7%E5%B9%B3%E7%AD%89%E5%92%8C%E8%B5%8B%E4%BA%88%E5%A6%87%E5%A5%B3%E6%9D%83%E5%88%A9%E5%B7%A5%E4%BD%9C%E6%80%BB%E7%BB%93%E6%8A%A5%E5%91%8A.pdf</p>

CRITERION	RATING	COMMENT
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the Entity's Area of Influence. Nonetheless, the Entity has established an Indigenous Peoples Protection Policy that is compatible with ILO Convention 169, available at: https://www.palum.com/tc/iresgreports.aspx
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 present in the Entity's Area of Influence and there have been no New Projects or Major Changes at the Entity.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity is located in a dedicated industrial zone and the area has been developed by the local government, with no cultural or sacred heritage.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no cultural or sacred heritage sites or values are present within the Entity's Area of Influence. The Entity is located in a dedicated industrial zone and the area has been developed by the local government, with no cultural or sacred heritage. There are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes after the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has identified Affected Populations and Organisations and identified potential impacts related to health and safety, social and cultural Human Rights and the environment resulting from its activities. It has developed a Community Investment and Development Program to identify, prevent, monitor, mitigate and account for any significant impacts, which is disclosed at: https://www.palum.com/pdf/%E7%A4%BE%E4%BC%9A/2025%E5%B9%B4%E5%BA%A6%E7%A4%BE%E5%8C%BA%E5%92%8C%E5%BD%B1%E5%93%8D%E4%BA%BA%E7%BE%A4%E5%BD%B1%E5%93%8D%E5%85%B7%E4%BD%93%E8%AE%A1%E5%88%92.pdf?v=1</p> <p>The Entity has a process to update the Community Program annually and ensure implementation.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals that aim at best integrity practices. The Entity has exercised risk-based Due Diligence in the Products they manufacture to ensure materials are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals that aim at best integrity practices. Due Diligence is undertaken to mitigate the reputational risks of all Stakeholders. It was also demonstrated that 100% of the Alumina in the Entity's supply chain is sourced from ASI Performance Standard Certified Entities.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as it has demonstrated that 100% of the Alumina in its supply chain is sourced from ASI Performance Standard Certified Entities. As a result, the identified and assessed risks in the supply chain is low.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity has conducted Due Diligence monitoring on its Aluminium supply chain and this ASI Audit provides an independent Third Party audit of Due Diligence practices. Based on document review, the Entity has exercised risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from CAHRAs.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	Based on the Entity's internal assessment, it has been determined that no materials have been sourced from CAHRAs and the Entity does not contribute to armed conflict or Human Rights abuses in CAHRAs. The Entity's annual Responsible Mineral Supply Chain Due Diligence Report is available at: https://www.palum.com/pdf/%E7%A4%BE%E4%BC%9A/%E8%B4%9F%E8%B4%A3%E4%BB%BB%E7%9F%BF%E4%BA%A7%E4%BE%9B%E5%BA%94%E9%93%BE%E5%B0%BD%E8%B4%A3%E7%AE%A1%E7%90%86%E6%8A%A5%E5%91%8A.pdf?v=1
9.9 Security practice	Conformance	The Entity has established a procedure and implemented security practices that respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law related to Freedom of Association and Collective Bargaining in China. Regardless, the Entity has a Policy to respect the Freedom of Association and has established an Employee Representative Committee and employee representatives are freely elected by employees.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has committed to respect the right of Freedom of Association and Collective Bargaining. The Entity respects the rights of employees to freely associate, join or not join Trade Unions, seek representation, and join employee committees in accordance with the law. Collective Bargaining Agreements are signed between the Entity and Worker representatives.
10.2a-c Child Labour	Conformance	The Entity has a Policy that defines the prohibition of Child Labour. There is no Child Labour or young Workers (16 – 18 years) at the Entity, the youngest Worker is 19 years old. Child Labour is prohibited in China. Young Workers are under special protection by law and not allowed to work in hazardous conditions.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	<p>The Entity has established regulations that strictly prohibit Forced Labour, including Human Trafficking and modern slavery, and which apply to the Entity and its suppliers.</p> <p>Worker interviews and document review confirmed that there are no instances of illegal wage deduction, Debt Bondage, debt repayment, or any other form of Forced Labour at the Entity. All employees are hired directly. Worker interviews also confirmed that the Entity does not restrict the freedom of movement of Workers in the workplace or in onsite housing.</p> <p>The Entity's Modern Slavery Statement is available at: https://www.palum.com/pdf/%E7%A4BE%E4BC%9A/%E5%8F%8D%E5%A5%B4%E9%9AB6%E5%88%B6%E5%8F%8AE5%8F%8D%E4%BA%BA%E5%8F%A3%E8%B4%A9%E5%8D%96%E5%A3%B0%E6%98%8E.pdf?v=1</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity promotes a culture of non-Discrimination in hiring, salary, promotion, and training process, which is expressed in its Human Rights Policy, available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E4%BA%BA%E6%9D%83%E6%96%B9%E9%92%88%E6%89%BF%E8%AF%BA%E4%B9%A6.pdf</p> <p>A Grievance/Complaints Mechanism is available for employees and third parties to lodge related complaints, available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E5%86%85%E3%80%81%E5%A4%96%E9%83%A8%E5%88%A9%E7%9B%8AE7%9B%B8%E5%85%B3%E6%96%B9%E6%8A%95%E8%AF%89%E7%94%B3%E8%AF%89%E5%88%B6%E5%BA%A6.pdf?v=1</p> <p>Measures have been taken to protect the rights and interests of female employees and ensure equal opportunities. No Discrimination at the Entity was identified during the Audit.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has demonstrated that it ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of labour and compensation issues, without threat of reprisal, intimidation or Violence and Harassment. Employee Satisfaction Surveys and Continuous Improvement Proposals have been implemented. Employees can raise concerns, suggestions or complaints via suggestion boxes, Worker meetings, or email. The Grievance Mechanism is available at: https://www.palum.com/pdf/%E6%B2%BB%E7%90%86/%E5%86%85%E3%80%81%E5%A4%96%E9%83%A8%E5%88%A9%E7%9B%8AE7%9B%B8%E5%85%B3%E6%96%B9%E6%8A%95%E8%AF%89%E7%94%B3%E8%AF%89%E5%88%B6%E5%BA%A6.pdf?v=1</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a Policy on the prevention of Violence and Harassment in the workplace, as well as a mechanism for filing and handling complaints in the event of Violence or Harassment. The Policy will be reviewed every five years. The Policy is available at: https://www.palum.com/pdf/%E7%A4BE%E4BC%9A/%E6%9A%B4%E5%8A%9B%E5%92%8CE9%AA%9AE6%89%B0%E7%AE%A1%E7%90%86%E8%A7%84%E5%AE%9A.pdf</p> <p>The Entity respects its employees, and disciplinary measures are in compliance with legal requirements. Worker interviews confirmed that there is no case of Violence or Harassment at the Entity.</p>

CRITERION	RATING	COMMENT
10.7a-d Remuneration	Conformance	The wages provided to Workers meet both the legal standard and the basic needs of Workers. Wages are paid timely and accurately by bank transfer and payslips are issued to Workers.
10.8a-c Working Time	Conformance	Working hours are recorded manually for all employees. Working Time was confirmed via Worker interviews and sampled attendance records. The Entity implemented a three-shift system for production staff, with employees working eight hours a day, with at least one day off every seven days.
10.9a-b Informing Workers of Rights	Conformance	The Entity has demonstrated that it guarantees open communication and direct engagement with Workers and their representatives with regard to working conditions, rights and protections and the resolution of labour and compensation issues, without threat of reprisal. Employees are informed of their rights during pre-job training.

11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an integrated Management System certified against ISO 45001:2018 Occupational Health and Safety (OH&S) Management Systems.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The latest internal audit of the Entity's Integrated Management System was performed in April 2025. OH&S objectives and targets, including leading and lagging indicators are established and documented in the Entity's OH&S Program. The implementation plans are established. The Entity's OH&S performance is monitored monthly and the management review is conducted annually to review the OH&S system. The latest internal audit of the Entity's Integrated Management System was performed in April 2025.</p> <p>The Entity has published its OH&S performance in the Comparison Report on OH&S Safety Goals with Industry Performance and Leading Practice:</p> <p>https://www.palum.com/pdf/%E7%A4%BE%E4%BC%9A/2024%E5%B9%B4%E5%BA%A6%E8%81%8C%E4%B8%9A%E5%81%A5%E5%BA%B7%E5%AE%89%E5%85%A8%E7%9B%AE%E6%A0%87%E4%B8%8E%E5%90%8C%E8%A1%8C%E4%B8%9A%E7%BB%A9%E6%95%88%E5%92%8C%E9%A2%86%E5%85%88%E5%81%9A%E6%B3%95%E7%9A%84%E6%AF%94%E8%BE%83%E6%8A%A5%E5%91%8A.pdf?v=1</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in OH&S in accordance with the requirements of ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Worker representatives, and management responds to the concerns and advice provided by Workers.

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.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 September 2025	Initial Certification Audit – Full Certification