ASI CERTIFICATION
PERFORMANCE STANDARD

PRESENTED TO

Qinghai Baihe Aluminium Co., Ltd

CERTIFICATE NUMBER

433

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

CERTIFICATION LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM

SGS-CSTC STANDARDS TECHNICAL SERVICES

DATE OF ISSUE

15 OCTOBER 2025

DATE OF EXPIRY

14 OCTOBER 2028

CERTIFIED SINCE

15 OCTOBER 2025

AUTHORISED BY

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Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at ***www.aluminium-stewardship.org***

CERTIFICATION SCOPE

Manufacture and production of Liquid Aluminium and Aluminium ingots at Qinghai Baihe Aluminium Co., Ltd, Qinghai Province, China.

AUDIT REPORT
PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	QINGHAI BAIHE ALUMINIUM CO., LTD
ENTITY NAME	Qinghai Baihe Aluminium Co., Ltd
CERTIFICATION SCOPE	Manufacture and production of Liquid Aluminium and Aluminium ingots at Qinghai Baihe Aluminium Co., Ltd, Qinghai Province, China.
SUPPLY CHAIN ACTIVITIES	• Aluminium Smelting • Casthouses
ASI STANDARD	Performance Standard V3
AUDIT TYPE	• Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	• 22 – 25 July 2024
AUDIT REPORT SUBMISSION	• 14 December 2024
AUDIT SCOPE	The Audit Scope includes the manufacture and production of Liquid Aluminium and Aluminium ingots at Qinghai Baihe Aluminium Co., Ltd, located in Qinghai Province, China. Supply chain activities included in the Audit Scope: • Aluminium Smelting • Casthouses All applicable criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	15 October 2025 – 14 October 2028

NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	14 April 2027
CERTIFICATE NUMBER	433
	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

Qinghai Baihe Aluminum Co., Ltd (the 'Entity') was established in 1997, employs over 3,350 people and has a registered capital of 4.82 billion RMB. It is located in Ganhe Industrial Park, Xinning City, Qinghai Province, China and is a wholly owned subsidiary of Qinghai Province Investment Group Co., Ltd.

The Entity produces Liquid Aluminium and Aluminium Ingots with approximately 680,000 tonnes of annual production of saleable product. It has a total capacity of 700,000 tonnes of electrolytic Aluminium with 876 sets of prebaked anode electrolytic cells, including 312 sets of 240 series electrolytic cells with a capacity of 200,000 tonnes and 564 sets of 330 series electrolytic cells with a capacity of 500,000 tonnes. It is the largest electrolytic Aluminium production location within Qinghai Province, China.

Other ancillary infrastructure on-site includes accommodation, administrative offices, casting facilities, anode baking, maintenance workshops, purification facilities, a power room, a quality inspection centre, a warehouse and a comprehensive service centre. Nearby sensitive receptors include the Kumbum Monastery, a religious shrine approximately ten kilometres away and is under protection.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain awareness of and ensure Compliance with Applicable Laws. Related departments have identified and collected the Applicable Laws and regulations. The Entity has undertaken Compliance evaluations and prepares annual evaluation reports.
1.2 Anti-Corruption	Conformance	The Entity has established a procedure that addresses Corruption in all its forms. Evaluation of the Corruption risk for every position has been undertaken and related actions implemented. The Entity has established an anti-Corruption team.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, which is reviewed at least every five years, on any changes to the Business that alter Material environmental, social or governance risks or on indication of a control gap. The Code of Conduct has been publicly disclosed: http://www.qhinv.com.cn/workplaces/cn/upload/file/5995ddc647c9ba7eabb249847c638f2c.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an integrated Policy consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Environmental, Social and Governance Policy is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/bc5d5a0ee7fa7840ee7fc90ab9bc4d15.pdf
2.2a-c Leadership	Conformance	The Entity's Vice General Manager has been nominated as the Management Representative to lead the implementation of the Policies and provide the resources needed to establish, implement, maintain and improve the Management Systems required by the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an ISO 14001:2015 certified Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Social Management System which includes a procedure for the protection of Human Rights, and the implementation of an Occupational Health and Safety (OH&S) Management System.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and implemented an Integrated Management System (IMS) that addresses supply chain management and includes relevant Policies and Procedures. The Responsible Procurement Policy, which addresses the Entity's Due Diligence practices, is publicly disclosed at: http://www.qhinv.com.cn/workplaces/cn/upload/file/5841a6e7fdac5339f9fd744c4638806b.pdf A Responsible Supply Chain Procurement Policy is also disclosed:

CRITERION	RATING	COMMENT
		http://www.qhinv.com.cn/workplaces/cn/upload/file/c96f9eb93eb0183a88c4a566c274bbf3.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facility.
2.6a-h Human Rights Impact Assessment	Conformance	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facility.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan for environmental incidents and an Emergency Response Plan for production safety accidents. The Plan was prepared in consideration of the requirements of the local government, Affected Populations and Workers. The latest version of the Emergency Response Plan is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/0de09f1b5da0e7f741cdbe9537a9d76e.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which takes into account Material adverse environmental, social and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a documented procedure for the management of any mergers and acquisitions . In the last three years, no mergers or acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a documented procedure for closure, decommissioning and divestment. The procedure has defined that the Entity should review the environmental, social and governance practices. All information must be disclosed in consultation with Workers, the Local Community, and the local government. In the last three years, no closure, decommissioning or divestment has occurred.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared and publicly disclosed its 2023 Sustainability Report, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable law. There were no non-compliances or liabilities during 2023, as disclosed in the Sustainability Report, page 16: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
3.3a-c Payments to Governments	Conformance	The Entity maintains financial records which demonstrated that payments to Governments included the payment of taxes only, in accordance with the law and donations to charity organisations. The Entity has not made any financial or in-kind political contributions, as disclosed in the Sustainability Report, page 16:

CRITERION	RATING	COMMENT
		http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Complaints Resolution Mechanism and different channels are available including a local area network and hotline number. The Complaints Mechanism is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/ea556a6aa421c5d8af9a94d272ac2083.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed and submitted an Environmental Product Disclosure (EPD) report to the Swedish Environmental Research Institute. The EPD contains key Life Cycle Assessment data and limitations. The EPD Certificate is available at: https://www.environdec.com/library/epd12410
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has evaluated the life cycle impacts of its major Product (Liquid Aluminium) from 'cradle-to-gate' in its EPD report. There have been requests to the Entity to provide Life Cycle Assessment (LCA). Some of the Entity's customers require the Entity to submit its Product Carbon Footprint.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a recycling rate of 100% as a goal for Aluminium Process Scrap generated during production and regularly evaluates their achievement against the goal. The Entity manages five types of Aluminium alloy grades through colour classification.
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 has signed an agreement with a Dross disposal contractor. The contractor's method of disposing of Dross is to produce recycled Alumina powder and remelt Aluminium ingots. The Entity regularly assesses the contractor's recycling rates. There are currently no regional or national collection and recycling systems available.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has disclosed its Direct and Indirect GHG emissions data (Scopes 1 and 2) in the GHG Emission Report: http://www.qhinv.com.cn/workplaces/cn/upload/file/b95f51be3c98381d2e6f5d20709fbf5d.pdf The Entity has an established procedure to ensure annual analysis of energy use and Greenhouse Gas (GHG) emissions, and a process to ensure GHG emissions data is verified by a Third Party. However, at the time of the Audit, whilst previous years' GHG emissions data had been Third Party verified, the verification of the Entity's current GHG emissions data had not been finalised. Additionally, the

CRITERION	RATING	COMMENT
		GHG Emissions Report does not disclose the Entity's Scope 3 GHG emissions.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as the Aluminium Smelter was established before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Minor Non-Conformance	The Entity has submitted a carbon footprint report and has a carbon footprint certificate for one tonne of unalloyed Aluminium ingot for re-melting. The certificate presents the 'cradle-to-gate' GHG emissions intensity of one tonne of unalloyed Aluminium ingot for remelting. The Entity's GHG emissions intensity is well below the ASI Performance Standard threshold of 11 tonnes CO_2e/tonnne. However, the Entity's 'cradle-to-gate' GHG emissions data in the carbon footprint report addresses only the Entity's unalloyed Aluminium ingot Products and does not include the Liquid Aluminium Product, which is the greater output from its Smelter.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan and Pathway that is consistent with the ASI methodology for a 1.5ºC warming scenario: http://www.qhinv.com.cn/workplaces/cn/upload/file/89c4a791d03d277c7a6404a831b8e185.pdf The Entity has established 2023 as the baseline year. The Entity has established Intermediate Targets including a five-year target and a 2050 target to achieve 0.11 t CO_2e/t. The reduction plans include adopting fully graphitized cathode electrolytic cells, energy-saving steel claw transformation, research and development of carbon free Aluminium technology, use of variable frequency motors for exhaust fans, and distributed photovoltaic projects. The Plan is reviewed annually during the management review process. The Entity's GHG emissions objectives from 2021 to 2023 were achieved.
5.4 GHG Emissions Management	Conformance	The Entity has established an ISO 50001:2018 certified Energy Management System. The main source of GHG emissions is energy consumption, which is closely monitored, and energy efficiency is continuously improved. The Entity has implemented a GHG Emission Management Procedure to achieve performance aligned with its GHG Emissions Reduction Plan and targets, which includes control measures to manage GHG emissions and annual analysis of GHG emissions according to ISO 14064-1:2018.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has publicly disclosed Material Emissions to Air at: http://www.qhinv.com.cn/workplaces/cn/upload/file/a10e7f1a152dc537725b017e4fd66522.pdf The Entity has implemented plans to minimise exposure to, and impacts from, Emissions to Air in accordance with the Environmental Impact Assessment. The significant pollution factors of Emissions to Air include particulates, sulphur dioxide, and fluoride.

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	Following treatment, industrial wastewater is used as recycled cooling water without any discharge. Domestic wastewater enters the industrial park's sewage treatment plant for disposal. The Entity has quantified and publicly disclosed Discharges to Water, as zero, in the 2023 Sustainability Report, page 17: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted a risk assessment and disclosed the Leakage and Leakage Risk Identification Report, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/6d2d368e3324231f0e4fe398f3884943.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	To date, no significant Spills or Leakages have occurred and therefore there is no requirement to disclose details to Affected Populations and Organisations. The Entity has disclosed the Leakage and Leakage Risk Identification Report, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/6d2d368e3324231f0e4fe398f3884943.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has publicly disclosed its Waste management practices and the quantity of solid Waste and Hazardous Waste generated. The Entity's 2023 General Industrial Solid Waste Utilisation and Disposal Account is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/e51759e2c6331202f614bb0a1c3be231.pdf The Waste Transfer and Disposal Report is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/63ce95e16668a079b2832fb655c6a02f.pdf The Entity's Waste reduction plan is designed in accordance with the Waste Mitigation Hierarchy, disclosed in the Pollutant Production and Emissions 2022 and Emissions Reduction Plan 2023 report: http://www.qhinv.com.cn/workplaces/cn/upload/file/183f8c18e12c1fa39a26ec8022d9b1d3.pdf
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)	Conformance	The Entity's Spent Pot Lining (SPL) is stored in the warehouse in accordance with local Applicable Law to prevent the release of SPL or leachate to the environment. SPL, including carbon slag, is transferred to a qualified Hazardous Waste disposal provider. Further information is available in the Waste Transfer and Disposal Report: http://www.qhinv.com.cn/workplaces/cn/upload/file/63ce95e16668a079b2832fb655c6a02f.pdf
6.8a-d Dross	Conformance	The Entity's Dross is appropriately stored and managed according to Applicable Laws to prevent the release of Dross and leachate to the environment. Dross is a Hazardous Waste and is transferred to a qualified disposal supplier for recycling. Further information is available in the Waste Transfer and Disposal Report: http://www.qhinv.com.cn/workplaces/cn/upload/file/63ce95e16668a079b2832fb655c6a02f.pdf

CRITERION	RATING	COMMENT
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has publicly disclosed its 2023 water withdrawal and use by source and type in the Water Resources Risk Assessment Report: http://www.qhinv.com.cn/workplaces/cn/upload/file/659a431da1019a1d59e06733ad010e16.pdf The Entity sources water use from the municipal water supply for both industrial and domestic use. Industrial water is used for cooling and is recycled and not discharged. Domestic sewage is discharged into the municipal sewage system. The Entity's risk assessment determined that water-related risks are low.
7.2a-e Water Management	Not Applicable	The Criterion is not applicable to the Entity, as the risk assessment determined that water-related risks are low. Nonetheless, the Entity has implemented water management plans as required by the local Ganhe Industrial Park Management Committee.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The risk to and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within the Entity's Area of influence is identified as low. The Environmental Impact Assessment report identified that the Entity is located within an industrial park with an impacted land use including agricultural ecosystems with cultivated crops.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk to and potential impacts on Biodiversity and Ecosystem Services were determined as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk to and potential impacts on Biodiversity and Ecosystem Services were determined as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as it does not depend on Priority Ecosystem Services. The risk to and potential impacts on Biodiversity and Ecosystem Services were determined as low.
8.4 Alien Species	Conformance	The risk of accidental introduction of Alien Species is assessed as low as all imported packaged goods are fumigated by customs when entering China.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has established the procedure for the 'Protection of Cultural Heritage Sites and Religious Sanctuaries' with a commitment that the Entity will not develop New Projects in World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as they are located within a government planned industrial park. There are no Protected Areas within its Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a Human Rights Management Policy, which addresses their commitment to anti-Discrimination, prohibiting sexual Harassment and bullying in the workplace, Collective Bargaining practices, and management of compensation and benefits, working hours and Child Labour. This Policy is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/bcffc4f785eaa93ec677db427f329116.pdf The Entity has established a Due Diligence process and a Complaints Mechanism is in place to cover the Entity's supply chain. The Entity has publicly disclosed its Human Rights Due Diligence Report at: http://www.qhinv.com.cn/workplaces/cn/upload/file/72d68532807ede14903bb1d86a01df91.pdf Detail on the Entity's management of Human Rights is disclosed in the Sustainability Development Report, Chapter 5 'Social Issues Management', pages 20-25: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf To date, there have been no Human Rights violations at the Entity, nor adverse Human Rights impacts reported.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a 'Protection of Female Employees Procedure' to ensure women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met, including labour contracts are equitable for both male and female employees. The Entity has established a Women Workers' Committee. The Entity's Labour Union has implemented a series of activities associated with International Women's Day, including a legal education campaign, which included over 400 female participants. Exemplary female employees were identified and promoted across various media platforms. Additional activities included education on role models, mental health and skills competitions for welding and electrical engineering. Female employees across various job roles interviewed during the Audit confirmed that their rights and interests are respected. The effectiveness of the measures taken to promote gender equity are disclosed in the Sustainability Development Report, page 22: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as it is located within an industrial park and there are no Indigenous Peoples or their lands, territories or resources within its Area of Influence. Nonetheless, the Entity has established an 'Indigenous Peoples Protection Procedure'.
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 or their lands, territories or resources within the Entity's Area of Influence and no New Projects or Major Changes have been initiated.

CRITERION	RATING	COMMENT
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 it is located within an industrial park and there are no Indigenous Peoples or their lands, territories or resources within its Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The cultural and sacred heritage survey determined that there are no cultural or sacred heritage sites or values within the Entity’s Area of Influence. The Entity is located in Ganhe Industrial Park, which was planned by the local government. The nearest religious shrine to the Entity is the Kumbum Monastery, approximately eleven kilometres from the Entity. The Environment Impact Assessment Report determined that the Entity's activities do not impact the religious shrine.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located within an industrial park and there are no New Projects or Major Changes that require resettlement. However, the Entity has established a ‘Project Construction Management Procedure’ to avoid involuntary resettlement and develop a resettlement plan with local Stakeholders. According to China's Regulations on Environmental Impact Assessment, all construction projects must submit an EIA Report addressing potential impacts on the environment and local communities.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has been in operation within its industrial park location for over 20 years, and there are no residential communities nearby, and adjacent organisations are in the aluminium supply chain industry and are not affected by the organisation's activities. The Entity has publicly disclosed its contribution to community activities in the 2023 Sustainability Development Report, page 31: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established and implemented an Integrated Management System (IMS) including various Policies and Procedures that address supply chain management. The Responsible Procurement Policy is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/5841a6e7fdac5339f9fd744c4638806b.pdf The Responsibility Supply Chain Management Regulations are available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/c96f9eb93eb0183a88c4a566c274bbf3.pdf The Entity has implemented its Due Diligence Management Procedure for a Responsible Alumina Supply Chain in Conflict-Affected and High-Risk Areas. Due Diligence on suppliers related to Conflict-Affected and High-Risk Areas (CAHRAs) is conducted annually. The Supplier Survey Forms confirmed that the Entity has identified CAHRAs in its supply

CRITERION	RATING	COMMENT
		chain and has taken measures to provide advice, training, or warnings to suppliers in CAHRAs. The Entity has established a supply chain Complaints Mechanism and published its Declaration of Compliance with Responsible Mineral Supply Chain Management Policy, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/debb1a3e20f072e6894c9e103c4633e5.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Due Diligence Management Procedure for a Responsible Alumina Supply Chain in Conflict-Affected and High-Risk Areas, which includes a sourcing management and supplier survey covering CAHRAs. The Entity has identified and evaluated risks in the supply chain through its sourcing system. At present, the only supplier of Alumina is a State-owned trading company, and the Alumina manufacturer is located in Shanxi Province, China and is not affected by CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a Due Diligence Management Procedure for a Responsible Alumina Supply Chain in Conflict-Affected and High-Risk Areas, in accordance with which the Entity will control supply chain risks. The Procedure ensures that once concerns or high-risk materials are detected, the Entity implements risk mitigation and management measures and reports results to senior management. The Entity will continuously monitor and evaluate the effectiveness of risk mitigation measures.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement. Additionally, the Entity's Sourcing Management Procedure requires it to conduct supplier Due Diligence in alignment with the ASI Performance Standard.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has disclosed its Supply Chain Due Diligence Management Report, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/15f94c6b37aa75459a7a52c7b644985b.pdf
9.9 Security practice	Conformance	The Entity has implemented procedures for security management with clearly defines job responsibilities, and that the Entity and the security providers shall respect Human Rights and abide by the Entity's Code of Conduct. The Code requires respect for Human Rights and all employees receive training on the Code. The Entity has implemented security practices that respect Human Rights. There are no Human rights violations related to security practices. The Entity's ASI Code of Conduct is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/5995ddc647c9ba7eabb249847c638f2c.pdf Security guards have been trained in Human Rights-related requirements. The training records of security officers sampled during the Audit confirmed that training addressed topics including anti-Discrimination, anti-abuse, anti-Harassment, voluntary employment and prohibition of Forced Labour, and employee grievances.

CRITERION	RATING	COMMENT
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 the Applicable Laws in China regarding Freedom of Association and Collective Bargaining. The Entity commits itself to respect Workers' rights and an association for Workers was established in accordance with legal requirements.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union. The constitution of the Labor Union addresses the employee representative election process and the rights of its members. All employees are members of the Labour Union.
10.2a Child Labour	Conformance	The Entity has established a procedure for the protection of underage Workers in alignment with ILO Conventions C138 and C182, relating to Child Labour, which stipulates that persons under 16 years may not be employed, and it is also prohibited for young Workers to be engaged in hazardous work. During the Audit, the Entity's Human Resources Department confirmed the youngest employee is 22 years old.
10.3a-c Forced Labour	Conformance	The Entity has established the 'Voluntary Employment and Prohibition of Forced Labor Management Procedure' to define the prohibition of Forced Labour. The Entity has also implemented procedures related to the prohibition of Discrimination, and mental and physical abuse. It is also stated in the Entity's Human Rights Management Policy that it does not engage in nor support the use of Forced Labour, available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/bcffc4f785eaa93ec677db427f329116.pdf The Anti-Slavery and Anti-Trafficking (Modern Slavery) Statement is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/00853f0d50949d582bdf35e53eafc1dd.pdf Interviews with Workers confirmed that the Entity does not engage in Forced Labour. The Entity does not retain employees' personal effects, and it does not require any form of deposit, recruitment fee, equipment advance or security payment.
10.4a-c Non-Discrimination	Conformance	The Entity has established an anti-Discrimination management control program that requires recruitment practices to be without regard to ethnic minorities, ethnicity, party affiliation, sex, race, political colour, sexual orientation, marital status, family responsibilities, age, or any other circumstances that may give rise to Discrimination. The Entity has provided Human Rights training, including anti-Discrimination, to all employees. Workers' employment contracts were reviewed during the Audit, which confirmed that termination of employment is by negotiation and compensation is paid in accordance with the provisions of the Labour Law. There have been no cases of dismissal of Workers and all departures are voluntary.
10.5 Communication and engagement	Conformance	The Entity has publicly disclosed its Complaints Resolution Mechanism which includes a commitment that 'whistleblowers' will not be threatened with retaliation, intimidation, or Harassment. The Entity provides open lines of communication for employees or employees'

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		representatives. An internal complaints box and feedback opportunities are provided within workshop areas and the office building.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Prohibition of Mental and Physical Abuse Management Procedure, and the Human Rights Management Policy is available at: http://www.qhinv.com.cn/workplaces/cn/upload/file/bcffc4f785eaa93ec677db427f329116.pdf The Policy commitment includes the elimination of Violence and Harassment. The Entity's ASI Manual stipulates that a review of Policy is required annually or when there are significant changes. Interviews with staff representatives, female operational staff, and representatives of the women's Trade Union committee stated that there were no incidents of Violence or Harassment at the Entity.
10.7a-c Remuneration	Conformance	The Entity has established a Salary Management Regulation, which addresses the requirement to make wage payments that are timely, in legal tender and fully documented. Wages are paid monthly. The Entity's calculation of Overtime meets the requirements of the regulations. The local minimum wage has been compared to the minimum salary paid by the Entity, which determines the Entity's wages well exceed the local minimum. Interviews with Workers confirmed they are generally satisfied with their salary level.
10.8a-c Working Time	Conformance	The Entity's work schedule provides for two days off per week, which can be rotated with a minimum of four days off per month. The Entity's Overtime compensation calculations are in accordance with regulations and Overtime cannot exceed 36 hours per month. Based on the sampled employee attendance records, Workers did not exceed an average of eight hours per day.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed employees of their rights when signing contracts and has explained in detail how their rights are guaranteed in the Entity's articles of association and regulation. Social responsibility training is provided to employees and includes information on lawful Freedom of Association.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's OH&S Management System is reviewed by senior management annually according to ISO 45001:2018 requirements. The Entity publicly disclosed the effectiveness of its OH&S Management System including leading and lagging indicators in the Sustainability Report 2023: http://www.qhinv.com.cn/workplaces/cn/upload/file/b7699c70d1d325a6734ac45ba9a48add.pdf Comparative analyses of performance with peer businesses and leading practice are undertaken and disclosed in the Safety Management Good Practice report:

CRITERION	RATING	COMMENT
		http://www.qhinv.com.cn/workplaces/cn/upload/file/0822ab283238040bf9910d3c6b665f7e.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an employee representative assembly. Employees annually participate in the decision-making process of OH&S safety management through the employee representative assembly.

ASI LIMITATION OF LIABILITY DISCLAIMER

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	15 October 2025	Initial Certification Audit – Full Certification