# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## Suzhou Chuangtai Alloy Material Co., Ltd.

CERTIFICATE NUMBER

356

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

11 APRIL 2024

**CERTIFICATION LEVEL** 

FULL CERTIFICATION

DATE OF EXPIRY

10 APRIL 2027

ASI ACCREDITED AUDITING FIRM

SGS-CSTC STANDARDS TECHNICAL SERVICES

**CERTIFIED SINCE** 

11 APRIL 2024

**AUTHORISED BY** 

The \_\_\_

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

#### **CERTIFICATION SCOPE**

The manufacture of un-forged Aluminium alloy billets and Aluminium alloy profiles including the melting, casting, cutting, homogenising, profile extruding, and computer numerical control machining at Suzhou Chuangtai Alloy Material Co., Ltd., China.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

MEMBER NAME	Shandong Innovation Group Co., Ltd.			
ENTITY NAME	Suzhou Chuangtai Alloy Material Co., Ltd.			
CERTIFICATION SCOPE	The manufacture of un-forged Aluminium alloy billets and Aluminium alloy profiles including the melting, casting, cutting, homogenising, profile extruding, and computer numerical control machining at Suzhou Chuangtai Alloy Material Co., Ltd., China.			
SUPPLY CHAIN ACTIVITIES	<ul><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>			
ASI STANDARD	Performance Standard V3.1			
AUDIT TYPE	<ul> <li>Initial Certification Audit (11 – 14 December 2023)</li> <li>Surveillance Audit (12 – 13 June 2025)</li> </ul>			
AUDIT FIRM	SGS-CSTC Standards Technical Services			
AUDIT DATE	<ul> <li>11 - 14 December 2023 (Initial Certification Audit)</li> <li>12 - 13 June 2025 (Surveillance Audit)</li> </ul>			
AUDIT REPORT SUBMISSION	<ul> <li>10 January 2024 (Initial Certification Audit)</li> <li>16 October 2025 (Surveillance Audit)</li> </ul>			
AUDIT SCOPE	Initial Certification Audit (11 – 14 December 2023)  The Audit Scope includes the melting, casting, slitting, homogenising, and profile extruding are the CNC machining processes used to manufacture unforged Aluminium alloy billets and Aluminium alloy.			
	Supply chain activities included in the Audit Scope:  Aluminium Re-melting/Refining  Casthouses  Semi-Fabrication			
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope.			
	Surveillance Audit (12 – 13 June 2025)  The Audit Scope includes the melting, casting, slitting, homogenising, and profile extruding are the CNC machining processes used to manufacture unforged Aluminium alloy billets and Aluminium alloy.			
	Supply chain activities included in the Audit Scope:  Aluminium Re-melting/Refining  Casthouses			

	Semi-Fabrication	
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope.	
AUDIT OUTCOME	Certification	
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:	
DECLARATION	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	11 April 2024 – 10 April 2027	
NEXT AUDIT TYPE	Re-Certification Audit	
NEXT AUDIT DATE	10 April 2027	
CERTIFICATE NUMBER	356	



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

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

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

#### **ENTITY OVERVIEW**

The Entity was established in December 2014, and is located in Suxiang Cooperation Zone, Suzhou City, Jiangsu Province. It specialises in the processing, sales, and production technology research and development of new Aluminium alloy materials, lightweight Aluminium magnesium alloy materials for transportation, and high-end products such as 3C. The Entity is a wholly owned subsidiary of Shandong Innovation Metal Technology Co., Ltd., and it covers a total area of approximately 128 hectares.

The Entity's main production processes include casting, extrusion, and machining, with a designed production capacity of 250,000 tonnes per annum for casting and 60000 tonnes per annum for extrusion. At present, production is approximately 220,000 tonnes per annum for casting and approximately 30,000 tonnes per annum for extrusion. The Entity has six workshops, one office building, and two dormitory buildings. Inside the workshops, tilting melting furnaces, automatic casting machines, homogenising furnaces, sawing machines, peeling lines, extruders, precision saws, aging furnaces, precision machining lathes, cleaning lines, stamping machines, bending machines, and other equipment. The workshop also has semi-finished product transfer warehouses and finished product warehouses.

The Entity is equipped with a re-use water treatment station, an air compression station, a hazardous waste warehouse, and a general solid waste warehouse. The Entity currently employs 675 people, and its main Stakeholders include shareholders, customers, partners, upstream supply chains, and Government-related departments. The Entity's continuous development provides employment opportunities for nearby residents and drives the economic development of the surrounding areas. The Entity's production activities do not have any impact on nearby communities.

#### **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	High	Low	LOW
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	High	Medium	MEDIUM
OVERALL		MED	IUM	

### **FINDINGS**

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a 'Laws and Regulations Management' Procedure which defines the responsibilities and the method, timing and frequency of identifying and evaluating Compliance with laws and regulations applicable to the environment, society and governance topics in the Compliance evaluation report. The Entity evaluates Compliance with these requirements annually.
1.2 Anti-Corruption	Conformance	The Entity has established the 'Program of Anti-Corruption and Anti-Foreign Bribery and Anti-Corruption Management Control' Procedure, which defines the prohibition of Bribery in all business practices and transactions.  The Responsible Procurement Policy also addresses anti-Corruption,
		available at: https://innovationmetal.com/d/file/p/2025/07- 09/7a78f89ae8645d07db2ad216ff4f0ee7.pdf
		The Bribery Policies and procedures are communicated to and understood by employees and others acting on behalf of the Entity. The Entity provides different anonymous reporting channels such as a 'whistleblowing' mailbox and call number, both available on the official Supervisory Notice Board. The Entity has demonstrated that the anti-Bribery Management System is effective.
1.3a-e Code of Conduct	Conformance	The Entity has published the Code of Ethics and Business Conduct, available at: <a href="http://innovationmetal.com/d/file/p/2023/12-22/fablccd3021aaea5e065df9e8dbe8d58.pdf">http://innovationmetal.com/d/file/p/2023/12-22/fablccd3021aaea5e065df9e8dbe8d58.pdf</a>
		The Responsible Business Alliance Management Manual was developed for the Entity's labour, Health and Safety, environment, business ethics and governance performance. The document control procedure prescribes that a review of these Codes is undertaken once a year.
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained a series of Policies consistent with the environmental, social, and governance practices. The Policies have been approved by the General Manager and supported through provisions of resources. In 2020, the Entity established an Environment, Health, and Safety Management System. In 2021, they also established a Social Responsibility Management System. These Management Systems require the Policy to be reviewed annually as part of the management review process. Additionally, any changes to the business that could affect environmental, social, or governance risks, or any indication of a control gap require a review of the Policy. The most recent review was conducted in October 2024.  The Policies are communicated internally through orientation, training, and display boards, and interested external parties can obtain the Policies at: <a href="https://innovationmetal.com/d/file/p/2025/07-09/8466ad3da82bde939b8aed8b25147ac1.pdf">https://innovationmetal.com/d/file/p/2025/07-09/8466ad3da82bde939b8aed8b25147ac1.pdf</a>
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated, and the responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an ISO 14001:2015 certified Environmental Management System, currently valid until February 2026. No fines or requests for corrective actions from government agencies or other Stakeholders.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented Social Management Systems and conformed to legal Compliance requirements. An annual Compliance evaluation is conducted, with no fines or requests for corrective actions from government agencies and other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Sourcing Management Procedure and a Responsible Sourcing Policy. Both the Sourcing Management Procedure and Responsible Sourcing Policy aim to communicate the environmental, social, and governance aspects to raw and auxiliary materials suppliers and contractors. The Entity has already communicated these Policies to all suppliers and contractors through the 'Numerical Control (NC) Sourcing System', which is the on-site procurement management system.
		The Entity's Responsible Sourcing Policy is available at: https://www.innovationmetal.com/d/file/p/2025/07-09/7a78f89ae8645d07db2ad216ff4f0ee7.pdf
		The Entity has recently completed all communication on responsible sourcing obligations to its suppliers and contractors via the Entity's Sourcing System, and all suppliers have been subjected to Due Diligence assessment.
2.5a-g Environmental and Social Impact	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
Assessments		However, the Entity has evaluated the environmental, social, cultural and Human Rights impacts as part of the Environmental Impact Assessment, as well as evaluating the effectiveness of occupational hazard controls during the Entity factory's initial construction. The Environmental and Social Impact Assessment is available at: https://www.innovationmetal.com/d/file/p/2023/12-22/14a413edd85c17f5008fb88237f17b01.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.
		However, the Entity has established a Human Rights Impact Assessment process and disclosed its performance on Human Rights in its Sustainability Development Report, pages 27-47: <a href="https://innovationmetal.com/d/file/p/2025/07-09/8c599371a6e5387eb21dbeeb3ffefldb.pdf">https://innovationmetal.com/d/file/p/2025/07-09/8c599371a6e5387eb21dbeeb3ffefldb.pdf</a>
		The Entity's commitment to Business and Human Rights Policy is available at: http://www.innovationmetal.com/d/file/p/2023/12-22/3e66e9915aa3f96f01e8caccc0dd636c.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Response Plans to address any potential for an Aluminium powder explosion and excessive discharge of domestic sewage and emissions. All employees are trained on the emergency plan with regular drills undertaken. The Entity has submitted the Emergency Plan with the local Ecology and Environment Bureau and Emergency Management Centre.

CRITERION	RATING	COMMENT
		The Entity has disclosed its Emergency Plan for Sudden Environmental Incidents at:  https://www.innovationmetal.com/d/file/p/2025/07- 09/7cf257019435fc865ald527dbb911bbd.pdf  The Entity's schedule of emergency plan drills is available at: https://www.innovationmetal.com/d/file/p/2023/12- 22/b2fa67ba2a055864eefd4c99aff06e29.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a Management of Suspension of Operations Procedure including a business resilience plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control that consider Material adverse environmental, social and governance impacts. The Entity reviews its Business Resilience Plan every five years. The procedure includes reviewing the Business resilience plan for any indication of a control gap or after any changes to the Business that alter the nature or scale of environmental, social and governance risks. As of now, no significant changes have been made, so no reviews have been implemented.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established management control procedures for investments and acquisitions. Currently, there is no merger or acquisition activity proposed.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. The last such activity occurred in 2023.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's 2024 Sustainable Development Report covers Material impact and governance approach to environmental, social and economic topics, available at:  https://www.innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf
3.2 Non-compliance and Liabilities	Minor Non- Conformance	The Entity has established the Code of Ethics and Business Conduct stipulating the public disclosure of information on an annual basis on Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. Details are available in the Code of Ethics and Business Conduct, page 18:  http://www.innovationmetal.com/d/file/p/2023/12-22/fablccd302laaea5e065df9e8dbe8d58.pdf  At the time of the Audit, the Entity however had one Government agency issued penalty outstanding.
3.3a-c Payments to Governments	Conformance	The Entity's 'Anti-Bribery and Anti-Corruption' Procedure and financial rules state that payments to the government must be approved by the Chairperson of the Board following a financial audit. The Entity publicly disclosed their donations at:  https://innovationmetal.com/d/file/p/2025/07-09/4d4c36e593a48a7f0d98014e030f5dc3.pdf
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity has implemented an accessible Complaints Resolution Mechanism, available at:

CRITERION	RATING	COMMENT
and Requests for Information		https://innovationmetal.com/d/file/p/2024/02- 26/38cf54f1d769aebff63f7d6a928d1a15.pdf
		The Employee Complaint Management Control Program is available at: <a href="https://www.innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf">https://www.innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf</a>
		The mechanism is reviewed every five years and after any changes to the Business that alter Material environmental, social and governance risks or on any indication of a control gap. On-site testing of the complaints hotline demonstrated there were no faults. The whistleblower phone number and General Manager email box information are available at: <a href="https://innovationmetal.com/about/memcompany/3.html">https://innovationmetal.com/about/memcompany/3.html</a>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non- Conformance	The Entity has established a Greenhouse Gases (GHG) Inventory Procedure and has a Life Cycle Assessment (LCA) verification statement for one kilogram (1kg) cast Aluminium products (raw material is 50% Recycled Aluminium ingot and 50% hydro-Aluminium ingot). The statement contents include the environmental impact categories in the lifecycle from 'cradle to gate'. The LCA Report is available at: <a href="https://innovationmetal.com/d/file/p/2025/07-09/fe4c0307a9c379780250e654e58f3338.pdf">https://innovationmetal.com/d/file/p/2025/07-09/fe4c0307a9c379780250e654e58f3338.pdf</a> In the Entity's LCA Report, other environmental impact assessments however lack detailed quantitative numerical descriptions.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's LCA Report is available at:  https://innovationmetal.com/d/file/p/2025/07- 09/fe4c0307a9c379780250e654e58f3338.pdf
		To date, the Entity has not received any customer requests for information regarding its Aluminium-containing products' cradle-to-gate LCA.
4.2 Product Design	Conformance	The Entity has established a 'New Product Development Controlling' Procedure that requires the consideration of materials selection and utilisation during the production development and process planning process. This procedure aims to ensure appropriate process selection, improved process efficiency, equipment and load optimisation, process optimisation, extended service life, convenient maintenance and cost-saving, as well as improving Scrap management and disposal.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a goal of achieving a 100% recycling rate for process waste generated during the production of Aluminium products and regularly evaluates its progress. The Entity manages five types of Aluminium alloy grades through colour classification, with all data on the quantities available through the Numerical Control (NC) system.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	As there is a lack of a local, regional, or national collection and recycling system for Aluminium Scrap in China, the Entity's headquarters has set up a Scrap Aluminium recycling company to increase recycling rates. In addition, the Entity is collaborating with customers and suppliers to determine how to improve the recycling rate of products at End of Life. The Entity has publicly disclosed its recycling strategy from 2023 to 2025 as well as actual quantities of reused Scrap Aluminium profiles and Aluminium Scrap: https://innovationmetal.com/d/file/p/2025/07-09/9b213074935dc6725b3bcbb086f02c36.pdf
5. GREENHOUSE GAS EMISSION	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has implemented a GHG Inventory Procedure, which requires annual verification and reporting of GHG emissions in accordance with ISO 14064-1:2018. The Entity has publicly disclosed Material GHG emissions from by source for its facilities on an annual basis in its Sustainable Development Report, Chapter 8, page 77:https://innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf
		The Entity has publicly disclosed its GHG Inventory Report at: <a href="https://innovationmetal.com/d/file/p/2025/07-09/4f21cda72146094a08c3bac8a54acfb0.pdf">https://innovationmetal.com/d/file/p/2025/07-09/4f21cda72146094a08c3bac8a54acfb0.pdf</a>
		The GHG Inventory Report addresses Direct and Indirect GHG Emissions data, which are verified by an independent body. Refer to: https://innovationmetal.com/d/file/p/2025/07-09/b03a9e8cc8286eeee04ec3c30ea266ec.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a 'GHG Controlling and Management' Procedure, which defines the annual analysis and implementation of GHG emission reports according to the ISO 14064-1:2018 standard. The Entity annually reviews its GHG Emissions Reduction Plan and the GHG Emissions Reduction Pathway, or after changes to the Business that may alter baselines or targets. The Entity plans to reduce its CO <sub>2</sub> emissions to below 1,400,000 tCO <sub>2</sub> e by 2025 according to its Energy and Resource Management Procedure. The GHG Emissions Reduction Plan includes emissions reduction initiatives such as recycling the waste heat from natural gas combustion exhaust gas, installing photovoltaic power generation equipment and purchasing 'green electricity'. The Entity's GHG Emissions Reduction Pathway is available at: https://innovationmetal.com/d/file/p/2025/07-21/edb07175dce9ed916796258f58a15141.pdf

CRITERION	RATING	COMMENT
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established a 'GHG Controlling and Management Procedure', which defines the annual analysis and implementation of GHG emission reports according to the ISO 14064-1:2018 standard. The Entity annually reviews its GHG Emissions Reduction Plan and the GHG Emissions Reduction Pathway, or after changes to the Business that may alter baselines or targets. The Entity plans to reduce its total CO <sub>2</sub> emissions to below 1,400,000 tCO2e by 2025 according to its Energy and Resource Management Procedure.  The Entity has prepared its GHG Emissions Reduction Plan and Pathway in accordance with the ASI GHG Pathways Tool, which is disclosed in the Sustainable Development Report, Chapter 5 Greenhouse Gas Management, pages 85–91: http://innovationmetal.com/d/file/p/2023/11-23/48cf13cdd7ce233b38a392c0dc9f0928.pdf  The Entity's Greenhouse Gas Emission Reduction Content and Plan is available at: http://www.innovationmetal.com/d/file/p/2023/12-22/973ec42c126ffd22a03c0dd231524ebb.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established an Energy Management System Manual and GHG Inventory Procedure, which defines the GHG emissions control measures and annual analysis of GHG emissions according to the ISO 14064-1:2018 standard to achieve performance aligned with the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has publicly disclosed its exhaust emissions data and exhaust gas management in its 2024 Sustainable Development Report, Chapter 8 Pollution Prevention and Control, page 71: https://innovationmetal.com/d/file/p/2025/07-09/8c599371a6e5387eb2ldbeeb3ffefldb.pdf  The Entity has publicly disclosed its exhaust gas emissions in 2024 and reduction plan in 2025 and at: https://innovationmetal.com/d/file/p/2025/07-10/bd23fdd9675ab8fe194a66992ald0912.pdf
6.2a-g Discharges to Water	Conformance	The Entity has publicly disclosed its wastewater management in its 2024 Sustainable Development Report, Chapter 8, page 70: https://innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf  The Environmental Impact Assessment Report has been prepared by a Third Party, which includes the quantified Discharges to Water that have adverse effects on humans or the environment. The report indicated that the sewage water included clean wastewater (the pollution factors include Total Phosphorus (TP), suspended solids (SS), petroleum products, pH, chemical oxygen demand (COD), total nitrogen (TN), animal and vegetable oils, ammonia nitrogen (NH3-N)), and domestic sewage.  The Entity has established a sewage water discharge management procedure and has a wastewater treatment facility to treat wastewater. The Entity commissions a Third Party to test wastewater discharge after treatment annually.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established a management plan to prevent, detect and remediate Material Spills and Leakages (including compliance controls and a monitoring program). The Entity has stipulated the cycle and timing of the five-year review of the management plan. The 2022 Contingency Plan includes a Spill Management Plan for dangerous chemicals, item 8:  https://www.innovationmetal.com/d/file/p/2023/12- 22/b2fa67ba2a055864eefd4c99aff06e29.pdf  A Chemical Spill Management Plan is included in the Emergency Plan for Production Safety Accidents, page 45, available at: https://www.innovationmetal.com/d/file/p/2024/01- 05/eef4f18b84be2645ecb801592e7ac28f.pdf
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity as there have been no incidents of Spills or Leakages. However, the Environmental Impact Assessment Report assesses the potential impact of Material Spills and Leakages as soon as practicable after an incident.
6.5a-c Waste Management and Reporting	Conformance	The Entity has established waste control procedures and implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The quantity of Hazardous and Non-Hazardous Waste generated in 2022 and the associated waste disposal methods are available at: https://innovationmetal.com/d/file/p/2024/02-25/e44ac66b3elc8feaaelc12d29acbc5e9.pdf  Additional disclosure information is available in the 2024 Sustainable Development Report, pages 72-74: https://innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has established waste control procedures and implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy. The storage volume of Aluminium Dross cannot be more than one-sixth of the annual Dross production volume. The amount of Dross generated is regularly monitored and disposed of regularly.  A delegated contractor is responsible for the disposal and recycles Aluminium from Dross. The contractor has achieved 100% resource recovery of the Aluminium, and therefore landfill is not required.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non- Conformance	The Entity has publicly disclosed its water use in its 2024 Sustainable Development Report, Chapter 8, page 69:  https://innovationmetal.com/d/file/p/2025/07- 09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf  The Entity's water meters, used for measuring sewage discharge however had not had water balance tests undertaken in the past three years.

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined that the water-related risks are low. The Entity's groundwater environmental sensitivity is not considered 'sensitive'.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Biodiversity Assessment Report for the Entity is available at: https://innovationmetal.com/d/file/p/2025/07-09/e8elb728c887b3ebb0154a5c861ded51.pdf  Based on the Environmental Impact Assessment Report, there are no protected flora and fauna within the Entity's Area of Influence. 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 risks and potential impacts on Biodiversity and Ecosystem Services have been assessed as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, risks and potential impacts identified are assessed and documented as low. The Environmental Impact Assessment Report demonstrated that there are no protected flora or fauna within the Entity's Area of Influence.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity are assessed and documented as low. The Entity has assessed the Materiality and risk of impacts on Biodiversity resulting from its land use and activities in the Area of Influence.
8.4 Alien Species	Conformance	The Entity has consulted the Invasive Alien Species of China website (https://www.plantplus.cn/ias) to check for alien or invasive species and assessed the risk of potential impacts. The Entity is located in the Chaohu Industrial Park, developed by the local government. Based on the Environmental Impact Assessment Report, there are no protected flora or fauna in the area. The assessment showed that there are no major risks or significant risks and impacts on Biodiversity in the Area of Influence.  The Entity has publicly disclosed its 'Biodiversity Protection Procedures
		at: https://innovationmetal.com/d/file/p/2025/07- 10/789c766b2a6017e86f727b4414293093.pdf
		The procedure requires risk assessment of impacts to Biodiversity and Ecosystem Sservices from activities conducted by or under the influence of the Entity each year.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has a commitment to "No Go" in World Heritage Properties in its ESG Policy, available at:  https://innovationmetal.com/d/file/p/2025/07- 09/8466ad3da82bde939b8aed8b25147acl.pdf
		The Entity is located in the Chaohu Industrial Park with no World Heritage Properties nearby.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an Industrial Park with no Protected Areas present.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established a Code of Ethics and Business Conduct which makes it necessary to identify, prevent, mitigate and account for how the Entity addresses actual and potential impacts on Human Rights. Refer to: http://innovationmetal.com/d/file/p/2023/12-22/3e66e9915aa3f96f01e8caccc0dd636c.pdf
		The Entity has publicly disclosed its respect for Human Rights in its Sustainability Development Report, Chapter 6 Respect for Human Rights, pages 30-55: <a href="https://innovationmetal.com/d/file/p/2025/09-16/9fa3db7dea7051ala0b9c15b52872604.pdf">https://innovationmetal.com/d/file/p/2025/09-16/9fa3db7dea7051ala0b9c15b52872604.pdf</a>
		The Complaints Resolution Mechanism for Human Rights violations is included in the Employee Complaint Management Control Procedure, page 3: https://innovationmetal.com/d/file/p/2023/12-22/068f2058e45c54b7cf042a972d16ad9e.pdf
		The Entity has identified no Affected Populations or Organisations that may be affected by their operational activities as they are situated within an Industrial Park.
		To date, no Human Rights violations have been reported by the Entity. The Due Diligence process has been established to cover the supply chain. The Entity has established a complaints/grievance channel for Stakeholders. If there is a need to contact the Entity, the contact information for the Vice General Manager is available. No adverse impacts have been reported to date.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a Protection of Female Employees Procedure whereby women's rights and interests are respected. The Entity has identified legal rights for women and has implemented control measures to ensure Compliance.
		Information on the rights and interests of women are publicly disclosed in the Sustainable Development Report, Gender Structure, page 34 and 41: Refer to: https://innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.  However, the Entity has established and implemented a Code of Practice for the Management of Indigenous Peoples and publicly disclosed the Policy, available at:  https://innovationmetal.com/d/file/p/2024/04- 02/a67307db2b78886a72ac112e5e8ac006.pdf

CRITERION	RATING	COMMENT
		https://innovationmetal.com/d/file/p/2025/09- 17/8a4472f667cb6553704f0c06fbc6e172.pdf
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as the Entity does not have any New Project or Major Change to existing Facilities. It is located in Chaohu Industrial Park.
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 present where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	The Entity has established a program for the protection of cultural and sacred heritage sites. The Entity is located in an industrial park where there are no sites of cultural and sacred heritage nearby and there are no new renovation or expansion projects currently planned.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage sites or values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no new renovations or expansion projects that we will require relocations.  China's regulations on Environmental Impact Assessment require an Environmental Impact Assessment Report for all New Projects.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Due Diligence process that required a Human Rights Due Diligence assessment related to the Community and Indigenous Peoples. The Entity has disclosed their Human Rights Report on Migration and Affected Populations.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has an integrated Management System that includes quality, environmental, Occupational Health and Safety, energy, and social responsibility. This system aligns with multiple ISO standards, including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, and SA 8000:2014. The supply chain is also considered within the Entity's Management System, with responsible procurement Policies, a Conflict Minerals and Conflict-Affected Areas risk control procedure, and annual Due Diligence on suppliers.  A 'Risk Control Procedure for Conflict Minerals and Conflict-Affected Areas' has been implemented, available at:
		https://innovationmetal.com/d/file/p/2025/07- 10/99c007ab5672cd9e37621a9d67a92618.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Conflict-Affected and High-Risk Areas (CAHRAs) have been identified, and measures have been taken to advise, train, and warn high-risk suppliers. The Entity's Business or purchasing is not affected by CAHRAs according to information provided in the Sustainable Development Report.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a procedure for controlling the risk of conflict minerals and conflict-affected areas. This procedure includes sourcing management and supplier surveys that cover CAHRAS management. The Purchasing Policy, based on the ASI Performance Standard, requires communication with all suppliers and contractors and covers environmental, social, and governance aspects. The Entity has designed and implemented sourcing strategies to address identified risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited against the ASI Performance Standard as part of this Audit. Due Diligence records confirmed no risk of conflict minerals, and no conflict-affected areas were found within the Entity's supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports supply chain Due Diligence annually – refer to the Sustainable Development Report, Chapter 7, page 63-64, available at: https://innovationmetal.com/d/file/p/2025/07-09/8c59937la6e5387eb2ldbeeb3ffefldb.pdf
9.9 Security practice	Conformance	The Entity has established Security Management Regulations, which require security personnel to respect Human Rights. The Entity's ASI Policy and the Code of Ethics and Business Conduct include a commitment to respecting Human Rights. The Policies are available for both internal and external Stakeholders.  Code of Ethics and Business Conduct: <a href="https://innovationmetal.com/d/file/p/2025/07-09/8466ad3da82bde939b8aed8b25147acl.pdf">https://innovationmetal.com/d/file/p/2025/07-09/8466ad3da82bde939b8aed8b25147acl.pdf</a>
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 they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
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 with approximately 675 members among its staff. The Labour Union Constitution outlines the union representative election process and member's rights.
10.2a Child Labour	Conformance	The Entity has established a Protection of Underage Workers Procedure in alignment with ILO Conventions C138 and C182, relating to Child Labour, which specifies that Child Labourers under 16 years may not be employed, and it is also prohibited to arrange for underage Workers to be engaged in hazardous work. During the Audit, it was confirmed that the youngest employee working at the Entity is 19 years old.
10.3a-c Forced Labour	Conformance	The Entity has established a Voluntary Employment and Prohibition of Forced Labor Management Procedure which specifies the prohibition of Forced Labour.  The Modern Slavery Statement is available at: https://innovationmetal.com/d/file/p/2025/07-09/dd69284627ld34f248c0a6c278f96246.pdf

CRITERION	RATING	COMMENT	
		Interviews with employees including management and operators demonstrated that they are freely and willingly employed. There is no retention of employees' personal effects, and there are no requirements to lodge deposits or security payments.	
10.4a-c Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Control Program, ensuring no hiring restrictions based on ethnicity, nationality, political affiliation, gender, race, sexual orientation, marital status, family responsibilities, age, or any other circumstances that may give rise to Discrimination. All employees have received Human Rights and Anti-Discrimination training. There have been no cases of dismissals, and all departures are voluntary.	
10.5 Communication and engagement	Conformance	The Entity has implemented an Employee Handbook which has been issued with information on lines of communication for employees or employee representatives and a commitment that whistleblowers will not be threatened with retaliation, intimidation, or harassment. During the Audit, a test of the whistleblower's phone number was conducted.	
10.6a-g Violence and Harassment	Conformance	The Entity's ASI Policy includes a commitment for the elimination of Violence and Harassment:  http://innovationmetal.com/d/file/p/2023/12- 22/3e66e9915aa3f96f01e8caccc0dd636c.pdf  There is a Management Review Control Procedure that specifies a review is to be conducted once a year and when there are significant changes or defects. Interviews with staff representatives, female operational staff, female Trade Union representatives and supplier employees confirmed that there were no incidents of Violence and Harassment.	
10.7a-c Remuneration	Conformance	The Entity has established Control Procedures for Hours of Work and Payroll Administration to ensure payments of wages are timely, in legal tender and fully documented. The Entity's calculation of Overtime compensation meets regulations. Interviews with employees confirmed they are satisfied that their salaries meet their needs.	
10.8a-c Working Time	Minor Non- Conformance	The Entity's Overtime compensation calculation method complies with regulations. However, due to difficulty in recruiting local Workers for the casting process, a few employees voluntarily applied for Overtime work, resulting in their average monthly Overtime hours exceeding 36 hours for six consecutive months.	
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed employees of their rights during the signing of their employment contract contracts which are detailed in the employee handbook. Social responsibility training given to employees covers 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, including a management manual and procedural documents. The Management System is internally audited and is reviewed annually.	

CRITERION	RATING	COMMENT
		The latest external audit of the Entity's OH&S Management System identified no major non-conformances, with one minor non-conformity raised and corrective actions completed.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has publicly disclosed the performance achievement of the OH&S Management System in the 2024 Sustainable Development Report, Chapter Employee Health and Safety, page 49: https://innovationmetal.com/d/file/p/2025/07-09/8c599371a6e5387eb21dbeeb3ffefldb.pdf
		Refer also to the Entity's OHS Management System Goal Achievement Record Form, available at:  https://innovationmetal.com/d/file/p/2025/07- 09/lab870le9df464ffe62f52f3e73aa0b2.pdf
		The Entity has also publicly disclosed its comparative analyses report on performance with peer Businesses and leading practice at: https://innovationmetal.com/d/file/p/2025/07-09/f77cc86c46lbl3983c4cb9a85cb7elaf.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a Safety Committee and a Trade Union. The Safety Committee is responsible for formulating and revising the Production Safety Management System, organising regular production safety inspections and keeping records. The Committee conducts employee satisfaction surveys, collects suggestions or opinions on OH&S from employees and provides the results of implementation of recommended corrective actions.
		The Labour Union and Safety Committee annually investigate and analyse work safety accidents, formulate improvement measures, and ensure implementation. Employees at the shift level report weekly on potential OH&S hazards, and the Safety Committee identifies and implements corrective actions and verifies their effectiveness over time.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 April 2024	Initial Certification Audit – Full Certification
1	24 November 2025	Surveillance Audit Update to Member Name from INNOVATION New Material Technology Co., Ltd. to Shandong Innovation Group Co., Ltd.