

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Guangyuan Linfeng Aluminum & Electricity Co., LTD

CERTIFICATE NUMBER  
**224**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**SGS-CSTC  
STANDARDS  
TECHNICAL SERVICES**

DATE OF ISSUE  
**22 NOVEMBER 2025**

DATE OF EXPIRY  
**21 NOVEMBER 2028**

CERTIFIED SINCE  
**22 NOVEMBER 2022**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. He', with a long horizontal line extending to the right.

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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](http://www.aluminium-stewardship.org)**

## CERTIFICATION SCOPE

Aluminium smelting processes for  
the manufacture of electrolytic  
Aluminium liquid at Guangyuan  
Linfeng Aluminum & Electricity Co.,  
LTD., Guangyuan City, Sichuan  
Province, China.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
ENTITY NAME	Guangyuan Linfeng Aluminum & Electricity Co., LTD
CERTIFICATION SCOPE	Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminum & Electricity Co., LTD, Guangyuan City, Sichuan Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (11 – 13 July 2022)</li><li>Surveillance Audit (12 – 13 March 2024)</li><li>Re-Certification Audit and Scope Change (1 – 5 September 2025)</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>11 – 13 July 2022 (Initial Certification Audit)</li><li>12 – 13 March 2024 (Surveillance Audit)</li><li>1 – 5 September 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 September 2022 (Initial Certification Audit)</li><li>11 May 2024 (Surveillance Audit)</li><li>11 November 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (11 – 13 July 2022)</u></p> <p>The Audit Scope included the Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminium &amp; Electricity Co., LTD.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (11 – 13 July 2022)</u></p> <p>The Audit Scope included the Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminium &amp; Electricity Co., LTD.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (1 – 5 September 2025)</u></p>

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The Audit Scope included the Aluminium smelting processes for the manufacture of electrolytic Aluminium liquid at Guangyuan Linfeng Aluminium & Electricity Co., LTD.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting

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

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AUDIT OUTCOME

- Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

- ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☒ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION PERIOD

22 November 2025 – 21 November 2028

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

21 May 2027

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CERTIFICATE NUMBER

224



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.

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## ENTITY OVERVIEW

Guangyuan Linfeng Aluminum & Electricity Co., LTD (the 'Entity') was established in late 2018, and is located in the Yuanjiaba Industrial Park, Guangyuan Economic and Technological Development Zone, Sichuan, China. The main production process at the site involves electrolytic Aluminium liquid production. The final Products are widely used by downstream Aluminium processing industries.

The Entity's primary production includes 234 sets of 400kA electrolytic Aluminium tanks, with a current output of 250,000 tonnes per year. The main factory building includes a joint plant, an anode assembly workshop and supporting office areas. The plant is equipped with electrolytic cells, an electrolytic multifunctional unit, a 12 tonne Aluminium lifting ladle, an Aluminium lifting ladle transport vehicle, Waste gas treatment system, wastewater treatment system and other related equipment.

The Entity operates a water treatment station, a comprehensive wastewater treatment station, an air compressor station, a Hazardous Waste warehouse and a general solid Waste warehouse. The facility also includes a staff lounge, changing rooms, and a temporary staff restaurant. There are also employee living quarters, which include a medical station, restaurants and basketball courts.

The Entity currently employs approximately 620 people. As the Entity is located within an industrial park, there are no sensitive receptors including residents, schools and public space. Its main Stakeholders include shareholders, customers, partners, downstream supply chains, and relevant government departments. The continuous development of the Entity provides employment opportunities for local residents and contributes to the economic development of the surrounding areas.

## 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
<b>SYSTEMS</b>	Low	Medium	Low	LOW
<b>RISKS</b>	Low	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Low	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has developed Laws and Regulations Management Procedure to define responsibilities as well as the method, timing, and frequency for identifying and evaluating Compliance with applicable Environmental, Social, and Governance (ESG) laws and regulations. It has also outlined how to track changes of applicable legal requirements. The Entity conducts a Compliance evaluation and prepares a written report annually.
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption Management Procedure, which requires high-risk positions, such as Sales, Procurement, and Human Resources, to analyse and assess Corruption risks, identify potential risk factors, and implement ongoing monitoring measures. The procedure has been revised to strengthen controls on extortion-related Corruption following a minor non-conformity identified in the previous ASI Performance Standard Certification Audit.</p> <p>The Responsible Sourcing Policy, which includes Anti-Corruption provisions, is available on the Entity's website at: <a href="https://www.zfsy.com.cn/News_detail/137.html">https://www.zfsy.com.cn/News_detail/137.html</a></p> <p>Anti-Bribery Policies and procedures have been communicated to, and understood by, employees and others acting on behalf of the Entity. The Entity provides anonymous reporting channels, including a 'whistleblowing' mailbox and a phone number, which are posted on the Supervisory Notice Board.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has published its ASI Code of Conduct, available at: <a href="https://www.zfsy.com.cn/News_detail/117.html">https://www.zfsy.com.cn/News_detail/117.html</a></p> <p>The Code has established guidelines for the Entity's labour, Health and Safety, environmental, Business ethics, and governance performance. The Entity reviews the Code every five years or whenever there are changes to the business that affect material environmental, social, or governance risks, or when there are indications of control gaps.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has published integrated Policies addressing environmental, social, and governance practices, available at: <a href="https://www.zfsy.com.cn/News_detail/137.html">https://www.zfsy.com.cn/News_detail/137.html</a></p> <p>The Policies are displayed on the factory bulletin board, and new employees receive orientation that includes these Policies. The Entity reviews the Policies annually as part of its Management System review.</p>
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative with overall responsibility and authority to ensure conformance with the ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented integrated Energy, Environmental, and Occupational Health and Safety Management Systems. It has also been certified to ISO 14001:2015.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	<p>The Entity has documented and implemented a Social Management System, including a Social Responsibility Policy and performance targets. It has also identified social responsibility risks and conducted Due Diligence for its employees, communities, and suppliers. To date, no fines or corrective action requests have been issued by Government agencies or other Stakeholders.</p> <p>The Entity, however, did not conduct an internal audit of the Social Management System in 2024.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a Sourcing Management Procedure, and its Responsible Sourcing Policy has defined the related requirements. The Responsible Sourcing Policy is publicly available at: <a href="https://www.zfsy.com.cn/News_detail/120.html">https://www.zfsy.com.cn/News_detail/120.html</a></p> <p>The Sourcing Management Procedure requires the Responsible Sourcing Policy to be communicated to raw and auxiliary materials suppliers and contractors, addressing environmental, social, and governance aspects in Compliance with the ASI Performance Standard. The Entity has completed communication with all suppliers and contractors.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity as no New Project or Major Changes have occurred since the Entity became an ASI Member.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity as no New Project or Major Changes have occurred since the Entity became an ASI Member.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has developed an Emergency Response Plan, addressing critical incidents including fires, power outages, floods, liquid Aluminium spills, and excessive emissions discharges. The Plan is available at: <a href="https://www.zfsy.com.cn/News_detail/215.html">https://www.zfsy.com.cn/News_detail/215.html</a></p> <p>All employees have been trained on the Emergency Response Plan, and regular drills are conducted.</p> <p>The local Ecological and Environmental Protection Bureau and Emergency Management Centre has requested the Entity's Emergency Response Plans, however no other relevant parties have made any requests. The Entity has filed the Emergency Response Plan with the local Ecology and Environment Bureau and Emergency Management Centre.</p> <p>The Emergency Response Plan, however, lacks specific contingency measures, including response procedures, reporting mechanisms, mitigation actions, rescue supplies, and notification protocols for relevant parties.</p>
2.8a-d Suspended Operations	Conformance	<p>Since production commenced, the Entity has not experienced any suspended operations. The Entity has developed management measures to ensure that suspended operations are effectively managed, with flexibility applied to production plans based on actual conditions. The Entity monitors Policy changes and maintains early communication with the Government to minimise environmental and social impacts. No changes or control gaps have been identified.</p>

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure to review environmental, social, and governance issues as part of the Due Diligence process for mergers and acquisitions. To date, no mergers or acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review environmental, social, and governance issues in the planning process for closure, decommissioning and divestment. To date, no closure, decommissioning or divestment has occurred.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity's parent company Henan Zhongfu Industrial Co., Ltd. discloses its ESG Report at: <a href="https://www.zfsy.com.cn/News_detail/136.html">https://www.zfsy.com.cn/News_detail/136.html</a> The Report addresses the Entity's Material impacts and governance approach related to environmental, social, and economic factors.
3.2 Non-compliance and Liabilities	Conformance	The Entity has established its ASI Code of Conduct, stipulating the annual public disclosure of information regarding Material fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law. The ASI Code of Conduct is available at: <a href="https://www.zfsy.com.cn/News_detail/117.html">https://www.zfsy.com.cn/News_detail/117.html</a>  The Entity's Public Credit Information Report for Legal Persons and Unincorporated Organisations, issued by CREDIT CHINA (available at <a href="https://www.creditchina.gov.cn/">https://www.creditchina.gov.cn/</a> ), was verified, along with searches on the websites of Non-Governmental Organisations (NGOs), such as the Institute of Public & Environmental Affairs (IPE). No cases were raised by Government agencies. There have been no significant fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law from 2024 to 2025.
3.3a-c Payments to Governments	Conformance	The Entity has established management procedures to ensure Compliance with legal requirements for government payments and to prohibit any unlawful payments. A Third-Party financial audit report has verified the Entity's transactions, with details available at: <a href="https://www.zfsy.com.cn/News_detail/125.html">https://www.zfsy.com.cn/News_detail/125.html</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented an accessible Complaints Resolution Mechanism, which is reviewed annually. On-site testing of the complaint tip-off call revealed no abnormalities. The tip-off call number and email for complaints can be found on the Supervisory Notice Board in the Entity's factory, and in the disclosed 'Interested Party Complaints, Appeals, and Information Requests', available at: <a href="https://www.zfsy.com.cn/News_detail/121.html">https://www.zfsy.com.cn/News_detail/121.html</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has established a GHG Inventory Procedure and prepared a Life Cycle Assessment (LCA) Report for liquid Aluminium Products, available at: <a href="https://www.zfsy.com.cn/News_detail/124.html">https://www.zfsy.com.cn/News_detail/124.html</a> The LCA report addresses environmental impact categories from 'cradle to gate'. The selected GHG emission factor for electricity,

CRITERION	RATING	COMMENT
		however, was too low, resulting in significantly lower values compared to industry benchmarks.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has established a GHG Inventory Procedure and developed a Life Cycle Assessment (LCA) Report for its liquid Aluminium Products. The system boundary of the LCA report is 'cradle-to-gate' (from resource extraction to Product factory delivery), including the raw material acquisition and Product production stages. More details are available at: <a href="https://www.zfsy.com.cn/News_detail/124.html">https://www.zfsy.com.cn/News_detail/124.html</a> To date, no customer has requested additional 'cradle-to-gate' LCA information for its liquid Aluminium.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity, as it only produces liquid Aluminium.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has developed a GHG Inventory Procedure, requiring annual analysis and submission of a GHG emission report. The Entity has published its 2024 Energy Consumption Analysis and GHG Verification Statement, available at: <a href="https://www.zfsy.com.cn/News_detail/219.html">https://www.zfsy.com.cn/News_detail/219.html</a> and <a href="https://www.zfsy.com.cn/News_detail/123.html">https://www.zfsy.com.cn/News_detail/123.html</a>  The GHG Inventory Report includes both direct and indirect emissions data (Categories 1-4), all of which were verified by an independent body.  The Entity, however, has not disclosed Material energy use and GHG emissions by source for 2024.
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	Conformance	The Entity commenced production in 2019, with a total Aluminium production of 250,455tonnes in 2024. The Entity's GHG emissions intensity in 2024 was 7.10 t CO <sub>2</sub> e/t Al.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established GHG emission reduction objectives for 2025-2028, using 2024 as the baseline year. These objectives align



CRITERION	RATING	COMMENT
		with a 1.5°C warming scenario and are available at: <a href="https://www.zfsy.com.cn/News_detail/129.html">https://www.zfsy.com.cn/News_detail/129.html</a>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	Prior to 2024, the Entity set its 2023 Emission Reduction Targets based on GHG emissions data from 2022. From 2025, the Entity has used the ASI Entity-Level GHG Reduction Pathway Tool and using 2024 GHG emission data, the Entity has calculated the annual GHG emission intensity slope for each year from 2025 to 2028. As 2024 is the Entity's baseline year and 2025 marks the first year of implementation, no performance toward the target needs to be demonstrated yet.
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed an Energy Management System Manual and a GHG Emission Management System, which require the implementation of GHG emission control measures and annual analysis of GHG emissions in Compliance with ISO 14064-1:2018. Both Systems are designed to achieve performance aligned with the GHG Emissions Reduction Plan and Targets.</p> <p>Additionally, the Entity has established a GHG Inventory Procedure that outlines the measures and requirements for GHG emissions inventory and reduction to meet the GHG emissions reduction goals.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has established an Air and Water Pollutant Emissions Management Programme, which requires emission testing in accordance with the Pollution Discharge License. Total Suspended Particulates (TSP) and Non-Methane Total Hydrocarbons (NMHC) are tested monthly. The Entity has publicly disclosed its 2023 exhaust gas emissions at: <a href="https://www.zfsy.com.cn/News_detail/214.html">https://www.zfsy.com.cn/News_detail/214.html</a>
6.2a-g Discharges to Water	Conformance	<p>The Entity has developed an Air and Water Pollutant Emissions Management Programme, which requires an annual review of the water pollutant reduction plan and updates following any changes that may lead to an increase in pollution risk. The Entity only discharges sewage water and does not produce industrial wastewater, so there is no requirement to minimise exposure or impacts from discharges to water.</p> <p>An Environmental Impact Assessment (EIA) Report, prepared by a Third Party, confirmed that there were no adverse impacts on water during the Entity's production activities. The Report indicates that the discharged wastewater is domestic sewage, with the main pollutants including Chemical Oxygen Demand (COD) and ammonia nitrogen (NH<sub>3</sub>-N). Production water is reticulated cooling water and as such is not discharged. The Entity has established a wastewater treatment Facility to treat sewage.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established an ASI Management Manual, which requires regular reviews of environmental risks related to leaks and the development of management plans to prevent, detect, and remediate Spills or Leakages. The Entity has developed a management plan to address Material Spills and Leakages, including Compliance controls and a monitoring programme. The ASI Management Manual stipulates that the Emergency Plan be reviewed at least every three years, or after any Spill or Leakage incident or Business changes that may affect Spill and Leakage risks or if any control gaps are identified. The Entity has publicly disclosed a Spills

CRITERION	RATING	COMMENT
		<p>and Leakages Risk Evaluation Report, which identifies and evaluates major risk areas where Spills and Leakages could contaminate air, water, and soil, available at: <a href="https://www.zfsy.com.cn/News_detail/146.html">https://www.zfsy.com.cn/News_detail/146.html</a></p> <p>The Entity has prepared a Risk Assessment Summary for Leaks and Seepage, which includes measures to control all types of Leakage and Spills, available at: <a href="https://www.zfsy.com.cn/News_detail/147.html">https://www.zfsy.com.cn/News_detail/147.html</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established an ASI Management Manual, which requires the public disclosure of the volume, type, and potential impact of any Material Spills or Leakage incidents to affected organisations and communities. To date, no Spills or Leakage incidents have occurred.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy aligned with the Waste Mitigation Hierarchy. This strategy includes transferring Waste to qualified suppliers for treatment and reusing Aluminium ash. Workshop employees are trained to minimise Waste generation. The Entity has disclosed both Hazardous and Non-Hazardous Waste generated, along with the methods of disposal, available at: <a href="https://www.zfsy.com.cn/News_detail/214.html">https://www.zfsy.com.cn/News_detail/214.html</a></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)	Conformance	The Entity has implemented a Spent Pot Lining (SPL) management procedure that addresses the storage and handling of SPL, along with associated responsibilities. SPL material, including lining material and refractory bricks, is reused where possible. SPL is stored in a designated and suitable area. SPL that cannot be recycled is treated as Hazardous Waste and transferred to a qualified supplier for disposal in Compliance with legal requirements. The Entity does not discharge SPL into any marine or aquatic environment.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's freshwater supply comes from the municipal water company and Jialingjiang River. The Entity has identified and mapped its water withdrawal and usage by source and type in its Water Resources and Water Use Report, available at: <a href="https://www.zfsy.com.cn/News_detail/128.html">https://www.zfsy.com.cn/News_detail/128.html</a></p> <p>All wastewater is recycled for cleaning and irrigation purposes, enabling the Entity to achieve zero wastewater discharge. A water-related risk assessment report for the watersheds within the Entity's Area of Influence is available at: <a href="https://www.zfsy.com.cn/News_detail/127.html">https://www.zfsy.com.cn/News_detail/127.html</a></p>
7.2a-e Water Management	Not Applicable	This Criteria is not applicable to the Entity, as water-related risks within its Area of Influence has been assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has developed a Biodiversity Conservation Regulation, which requires a risk assessment of the impacts on Biodiversity and Ecosystem Services from activities conducted by or within the Entity's Area of Influence every five years. The Entity has disclosed its Biodiversity Assessment Report, available at: <a href="https://www.zfsy.com.cn/News_detail/143.html">https://www.zfsy.com.cn/News_detail/143.html</a></p> <p>The Entity is located in the Yuanjiaba Nonferrous Metal Industrial Park, part of the Guangyuan City Economic and Technological Development Zone, developed by the local Government.</p> <p>In accordance with relevant legal requirements, the planning Environmental Impact Assessment (EIA) of the industrial park was completed before the Entity's project construction EIA. Both the EIA for the Entity's project and the EIA for the industrial park assessed the risks and impacts on Biodiversity from land use and activities within the Entity's Area of Influence as very low. The EIA reports indicated that there is no protected flora in the area and no large wild animals reside there. Additionally, the Entity is not located in farmland or a prohibited zone for construction expansion (ecological preservation area).</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as its Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as its Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity as 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.
8.4 Alien Species	Conformance	The Entity has established a procedure to prevent the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has established the Biodiversity Conservation Management Regulation and the Impact Assessment Regulation for New Projects, which commit to a 'No Go' Policy for World Heritage Properties. The Entity is located in the Yuanjiaba Nonferrous Metal Industrial Park, within the Guangyuan City Economic and Technological Development Zone, developed by the local Government. There are no World Heritage Properties near the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it has identified no Protected Areas within a five-kilometre radius.
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

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a Human Rights Policy, which includes a commitment to respecting Human Rights. The Policy is accessible to both internal and external Stakeholders through training, on-site postings, and via the website at:  <a href="https://www.zfsy.com.cn/News_detail/141.html">https://www.zfsy.com.cn/News_detail/141.html</a></p> <p>The Entity has established a Human Rights Due Diligence procedure to identify, prevent, mitigate, and address its actual and potential impacts on Human Rights. The Entity has published a Human Rights Due Diligence Report, available at:  <a href="https://www.zfsy.com.cn/News_detail/135.html">https://www.zfsy.com.cn/News_detail/135.html</a></p> <p>A List of Affected Populations and Organisations is also provided at:  <a href="https://www.zfsy.com.cn/News_detail/217.html">https://www.zfsy.com.cn/News_detail/217.html</a></p> <p>No Human Rights violations have been identified at the Entity.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has published its Human Rights Policy, which includes a commitment to protecting women's rights and interests, available at:  <a href="https://www.zfsy.com.cn/News_detail/141.html">https://www.zfsy.com.cn/News_detail/141.html</a></p> <p>The Entity has developed a Protection of Female Employees Procedure. It has identified legal rights for women and implemented control measures to ensure Compliance. Female and male employees receive equal pay for equal work and are treated equally in terms of promotions, evaluations for professional and technical positions, and welfare benefits. More details are available in the Entity's Summary of Women's Rights Protection Work, available at:  <a href="https://www.zfsy.com.cn/News_detail/134.html">https://www.zfsy.com.cn/News_detail/134.html</a></p> <p>The Entity has not been involved in any violations of women's rights.</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.</p> <p>The Entity, however, has established and implemented an Indigenous Peoples management procedure, which includes a commitment to respect the rights and interests of Indigenous Peoples.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.</p> <p>The Entity, however, has established an Indigenous Peoples Protection and Free, Prior, and Informed Consent (FPIC) procedure, available at:  <a href="https://www.zfsy.com.cn/News_detail/150.html">https://www.zfsy.com.cn/News_detail/150.html</a></p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.</p>
9.5a Cultural and Sacred Heritage – Identification	Conformance	<p>The Entity has developed a Protection and Management System for Cultural and Sacred Heritage, which requires the identification of cultural and sacred heritage before selecting a site for New Project construction. The Entity is committed to not constructing production or operation projects within the Protected Areas of cultural and sacred heritage.</p>

CRITERION	RATING	COMMENT
		The Entity has identified local cultural and sacred heritage sites via information disclosed by the Guangyuan Government. There are no cultural or sacred heritage sites nearby
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial park provided by the local Government, with no cultural or sacred heritage sites nearby. Additionally, no New Projects have been constructed by the Entity in other locations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial park and has had no relocation, new renovations, or expansion projects since its establishment.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established a Local Communities Management Procedure that outlines its commitment to respecting the rights of Local Communities. The Entity is dedicated to exploring opportunities with Local Communities and supporting their livelihoods, including employing individuals from these communities. The Entity has publicly disclosed its Environmental and Social Impact Management Plan, available at: <a href="https://www.zfsy.com.cn/News_detail/138.html">https://www.zfsy.com.cn/News_detail/138.html</a></p> <p>No negative impact on the Local Communities has been identified from the Entity's operations.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity is not located in Conflict-Affected and High-Risk Areas (CAHRAs) and does not contribute to or support suppliers in CAHRAs. The Entity is committed to not using conflict minerals and communicates this commitment throughout the Aluminium value chain in its Responsible Sourcing Policy, available at: <a href="https://www.zfsy.com.cn/News_detail/120.html">https://www.zfsy.com.cn/News_detail/120.html</a></p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has established a CAHRAs Due Diligence Management Procedure, which includes sourcing management and a supplier survey covering Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has identified and evaluated risks in the supply chain through its sourcing system.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has established a CAHRAs Due Diligence Management Procedure, which includes sourcing management and supplier surveys for CAHRAs. Based on the Sourcing Management Procedure, the Purchasing Policy is communicated to all suppliers and contractors, covering environmental, social, and governance aspects in Compliance with ASI Performance Standard.</p> <p>The Entity has implemented strategies to address identified environmental and safety risks within the sourcing system. Environmental, Health, and Safety (EHS) training is provided to suppliers entering the factory, and supplier personnel are invited to participate in the Entity's emergency drills. To date, no materials are sourced from or through CAHRAs.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has publicly disclosed its Responsible Mineral Supply Chain Due Diligence Report, showing the results of the CAHRA Due Diligence, available at: <a href="https://www.zfsy.com.cn/News_detail/216.html">https://www.zfsy.com.cn/News_detail/216.html</a>
9.9 Security practice	Conformance	The Entity has established a security practice management procedure and implemented practices that uphold Human Rights. No Human Rights violations related to security have been identified.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union, with all employees as members. The Employee Representative Conference is held annually. The Entity adheres to regulatory requirements for Labour Union activities, including regular meetings with Union representatives. Meeting minutes have been reviewed. Interviews with employees confirmed they are aware of their rights to Freedom of Association and Association.
10.2a-c Child Labour	Conformance	The Entity has established Regulations and Remedial Measures Procedures for managing Child Labour and underage Workers, in Compliance with ILO Conventions C138 and C182. These procedures stipulate that Workers under 16 cannot be employed, and underage Workers are prohibited from engaging in hazardous work. Communications with the Director of the Human Resource Department confirmed that the Entity's youngest employee is 24 years old.
10.3a-c Forced Labour	Conformance	The Entity has established a Prohibition of Forced Labor Management Procedure, defining the prohibition of Forced Labour. It has also publicly disclosed its Modern Slavery Statement, outlining actions taken to address modern slavery, available at: <a href="https://www.zfsy.com.cn/News_detail/145.html">https://www.zfsy.com.cn/News_detail/145.html</a> Interviews with employees, including management staff and operators, confirmed that the Entity does not coerce them into work. The Entity is not involved in Forced Labour. Employees' personal belongings are not retained by the Entity, and no deposits or security payments are required.
10.4a-c Non-Discrimination	Conformance	The Entity has established an Anti-Discrimination Management Procedure and an employee handbook outlining Anti-Discrimination rules for Workers. Employees are aware of the requirements, and to date, no Discrimination cases have been reported.
10.5 Communication and engagement	Conformance	The Entity has established a communication and participation management procedure to ensure regular communication with Workers and their representatives. An internal and external communication mechanism is available at: <a href="https://www.zfsy.com.cn/News_detail/121.html">https://www.zfsy.com.cn/News_detail/121.html</a> Through this communication mechanism, the Entity's Workers may raise concerns or complaints.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has publicly disclosed its latest Human Rights Policy, addressing Violence and Harassment on its website at: <a href="https://www.zfsy.com.cn/News_detail/141.html">https://www.zfsy.com.cn/News_detail/141.html</a></p> <p>The Policy was reviewed with employee representatives before issuance and disclosure. It commits to respecting employees' Human Rights, ensuring their rights to Non-Discrimination, protection from harsh or inhuman treatment, Freedom of Association, freedom of belief, equal and safe work, and prohibiting Child Labour and forced Overtime.</p> <p>The Entity has developed a Management Review Control Procedure, requiring annual reviews and additional reviews in the event of significant changes or incidents. Interviews with staff representatives, female operational staff, women's Labour Union representatives, and supplier employees confirmed that no incidents of Violence or Harassment have occurred within the Entity.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has established Control Procedures for Hours of Work and Salary, as well as Welfare Management Regulations, ensuring timely wage payments in legal tender and with full documentation. The calculation of Overtime compensation complies with regulatory requirements. Interviews with employees undertaken during the Audit confirmed their satisfaction with salary levels.</p>
10.8a-c Working Time	Conformance	<p>The Entity's Overtime compensation calculation method complies with regulatory requirements. A sample of 50 employees' Overtime schedules over 12 consecutive months demonstrated that no employee averaged more than eight working hours per day.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their rights upon the signing of employment contracts and provides detailed explanations in the employee handbook. Social responsibility training, including the right to Freedom of Association, has also been communicated to employees.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an Occupational Health and Safety (OH&amp;S) Management System, which includes management manuals and procedural documents. It conducts an internal audit and management review of the Environmental, Health and Safety (EHS) system annually and has passed Third-Party certification audits, obtaining ISO 45001:2018 Certification. A review of the latest external audit report confirmed no non-conformities. To date, there have been no fines or corrective action requests from Government agencies or other Stakeholders.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has established both an OH&amp;S Management System and a Social Responsibility Management System, with documented management manuals and procedural documents that stipulate internal audits and management reviews are conducted annually, and audits are also triggered by significant changes, serious non-conformities, complaints, or penalties. The Entity performs internal audits and management reviews of its EHS &amp; Social Responsibility Management Systems each year. The Entity has publicly disclosed its 2024 Occupational Health and Safety (OH&amp;S) Targets and Performance Achievements on its website, available at: <a href="https://www.zfsy.com.cn/News_detail/130.html">https://www.zfsy.com.cn/News_detail/130.html</a></p>

CRITERION	RATING	COMMENT
		It has also conducted a comparative analysis of its OH&S goals against leading practices, available at: <a href="https://www.zfsy.com.cn/News_detail/213.html">https://www.zfsy.com.cn/News_detail/213.html</a>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a Health and Safety Committee, which holds quarterly meetings to address major safety risks and develop solutions. The Entity also holds an annual Workers' Congress to elect employee representatives, including non-management personnel from the workshop. These representatives regularly participate in on-site 'near-miss' observations and in resolving safety hazards. Production employees are encouraged to report potential hazards or submit rationalisation proposals to the EHS Department at any time.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 November 2022	Initial Certification Audit – Full Certification
1	31 May 2024	Surveillance Audit
2	10 December 2025	Re-Certification Audit and Scope Change. Scope Change to apply PS V3.1.