

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Huanghe Xinye Co., Ltd.

CERTIFICATE NUMBER
349

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**CHINA QUALITY MARK
CERTIFICATION GROUP**

DATE OF ISSUE
18 JANUARY 2024

DATE OF EXPIRY
17 JANUARY 2027

CERTIFIED SINCE
18 JANUARY 2024

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*

CERTIFICATION SCOPE

Huanghe Xinye Co., Ltd. located in
Xining City, Qinghai Province
(China) with Liquid Aluminium and
Aluminium ingot production.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Huanghe Xinye Co., Ltd
ENTITY NAME	Huanghe Xinye Co., Ltd.
CERTIFICATION SCOPE	Huanghe Xinye Co., Ltd. located in Xining City, Qinghai Province (China) with Liquid Aluminium and Aluminium ingot production.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (13 – 16 November 2023)Surveillance Audit (7 – 9 July 2025)
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">13 – 16 November 2023 (Initial Certification Audit)7 – 9 July 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 December 2023 (Initial Certification Audit)1 September 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 16 November 2023)</u></p> <p>The Audit Scope covers the production process of liquid Aluminium and Aluminium ingot production, sales and after-sales service of Huanghe Xinye Co., Ltd. located in Xining City, Qinghai Province (China).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (7 – 9 July 2025)</u></p> <p>The Audit Scope covers the production process of liquid Aluminium and Aluminium ingot production, sales and after-sales service of Huanghe Xinye Co., Ltd. located in Xining City, Qinghai Province (China).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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

18 January 2024 –17 January 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

17 January 2027

CERTIFICATE NUMBER

349



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

Huanghe Xinye Co., Ltd. (the 'Entity') was established in September 2007 and is a wholly-owned subsidiary of Huanghe Hydropower Development Co., Ltd., which oversees the construction and operation of the joint hydropower and Aluminium project. Construction of the Entity's Facilities commenced in March 2008, with the primary operational phases occurring between 2009 and 2010, with a construction cost of approximately RMB 7.5 billion, over an area of over 133 hectares.

The Entity has a production capacity of 600,000 tonnes for Primary Aluminium and 300,000 tonnes for carbon anode, with a total number of over 1,700 employees. It includes nine functional departments, four production branches, and four functional centres. The closest residential area, Shangying Village, is located approximately 1.5 kilometres away.

Key Facilities comprise an Alumina warehouse, four electrolytic production plants, one casting plant, office buildings, dormitories, cafeterias, parking lots and warehouses. The Entity primarily sells its products within China, including markets in Shanghai and Jiangsu.

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's Compliance Obligation Acquisition and Confirmation Control Procedures and Compliance Evaluation Control Procedures indicate it has appointed a full-time legal counsel and a compliance officer. The Entity recently completed an evaluation of the applicability and Compliance of relevant regulations and confirmed that the Entity meets all legal and regulatory requirements.
1.2 Anti-Corruption	Conformance	In accordance with the requirements of its Anti-Bribery Management Procedures, the Entity has established an Anti-Bribery Policy, formed an Anti-Bribery management team and a risk assessment team, and conducts annual reviews and evaluations of its Anti-Bribery efforts.
1.3a-e Code of Conduct	Conformance	<p>The Entity's Codes of Conduct, including environmental, social, and governance codes, have been established and are operating effectively. The Entity has developed a Code of Conduct in Compliance with ASI requirements and has publicly disclosed it at: http://www.hhsd.com.cn/open/catalogue/sgdw/30/41281.html</p> <p>The Entity conducts annual internal audits and management reviews to assess Compliance with the Code of Conduct. The manual requires a comprehensive review of the Code at least every five years.</p> <p>To maintain the effectiveness of its systems, the Entity performs annual reviews of the Code of Conduct and updates it as needed. Revisions are made whenever significant changes occur in environmental, social, or governance risks or when signs of control deficiencies arise.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established Environmental, Social, and Governance (ESG) Policies within the ASI Management Manual and maintains documentation related to environmental management, Occupational Health and Safety (OH&S), ASI requirements, and social governance. The Entity's General Manager has developed and issued the ESG Policies, all of which have been formally approved and supported by the Entity.</p> <p>The Entity conducts annual management reviews in which the General Manager evaluates the continued suitability of the Policies. The Manual also requires that these Policies be reviewed, revised, and improved whenever organisational changes result in significant shifts in environmental, social, or governance risks, or when signs of control deficiencies arise. The Entity has not experienced significant changes in ESG risks and no control deficiencies have been identified.</p> <p>The Entity has also established procedures in the Management Manual requiring Policy reviews whenever changes occur that may impact ESG risk. The ESG Policy is communicated internally through documentation, training, and on-site presentations, and externally through promotional materials and corporate culture presentations.</p>
2.2a-c Leadership	Conformance	The Entity has appointed a Senior Executive as the ASI Management Representative, with their responsibilities defined in an official Letter of Appointment. They are responsible for leading and implementing the

CRITERION	RATING	COMMENT
		Entity's Policies and ensuring Compliance with ASI Standard requirements. Their duties include providing leadership and supervision to ensure that the Entity's Policies are effectively communicated both internally and externally. In Compliance with the ASI standards, the Management Representative is also authorised to direct and mobilise the Entity's human, social, environmental, and other corporate resources to establish, implement, maintain, and continually improve the Management System that meets ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has obtained a valid Environmental Management System Certificate, and its scope fully covers the requirements of the ASI Performance Standard.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed Social Management System requirements within its ASI Management Manual, addressing Human Rights and Labour Rights and providing a supporting framework.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established Procurement Control Procedures, which are continuously effective and implemented in Compliance with the Entity's ASI policy, covering environmental, social, and governance aspects. These procedures ensure that responsible procurement Policies are integrated and applied at all relevant levels of the Entity. The Entity has also publicly disclosed its updated Responsible Procurement Policy at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691047660.pdf</p> <p>The Entity conducts annual assessments of suppliers, with the most recent review completed in December 2024. Current evaluation processes and related agreements, including contracts, generally incorporate requirements for supplier Compliance with social responsibility, Human Rights, sustainable development, Due Diligence, and implementation of the ASI Responsible Procurement Guidelines. A sustainability questionnaire is also utilised.</p> <p>The Entity's Management Manual specifies that the Responsible Procurement Guidelines must be reviewed at least every five years. In addition, the Manual provides for timely reviews of the procurement Policy whenever organisational changes significantly impact environmental, social, or governance risks, or when there are indications of control deficiencies. The Entity has not experienced significant ESG risks, and no control deficiencies have been identified.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as it has not initiated any New Projects or made Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as it has not initiated any New Projects or made Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity's ASI Management Manual specifies requirements for emergency response plans, and the Entity has established Emergency Preparedness and Response Control Procedures, as well as emergency response plans for various environmental, social, and safety incidents. The Entity conducts regular drills to test these procedures and evaluates the suitability and effectiveness of the plans through annual internal audits and management reviews.

CRITERION	RATING	COMMENT
		<p>Following any emergency, the Entity reviews the implementation of the plan and updates it as necessary.</p> <p>The Management Manual also provides for timely review and improvement of emergency response plans when organisational changes alter the nature or scale of emergency risks or indicate control deficiencies; no control deficiencies have been identified to date. Emergency plans are reviewed annually, and any identified issues are promptly addressed. The Entity has disclosed its 2025 Special Emergency Plan Drill for Environmental and Production Safety Accidents and the Leakage Risk Identification and Management Schedule at: http://www.hhsd.com.cn/upload/files/2025-07-04/file_1751620756.pdf and http://www.hhsd.com.cn/upload/files/2025-07-04/file_1751620671.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established Business Suspension and Resumption Management Procedures to address production suspensions or shifts caused by a Force Majeure situation, incorporating measures to mitigate significant Environmental, Social, and Governance (ESG) impacts. The Human Resources and Production Technology Departments review these procedures every five years. Additionally, any organisational changes that alter the nature or scale of ESG risks, or indicate potential control deficiencies, trigger an immediate review. No such changes or control deficiency indicators have been identified to date.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established Procedures for Mergers and Acquisitions, which address preparation, identification of potential risks, risk mitigation measures, and other requirements. Environmental, Social, and Governance (ESG) factors are considered important in all Merger and Acquisition activities. As a wholly-owned subsidiary of Yellow River Hydropower, the Entity is responsible only for operations and management, while decisions on future Mergers and Acquisitions are primarily made by the parent group. No Mergers or Acquisitions have occurred since the Entity implemented the ASI system to date.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established relevant requirements for closure, retirement, and divestment in the ASI Management Manual. The Control Procedures for Closure, Retirement, and Withdrawal define working procedures in Compliance with ASI requirements. In the event of closure, retirement, or divestment, the Production Technology Department would take measures to reduce or avoid negative environmental and social impacts, ensure resources for implementation, and coordinate with local governments and communities.</p> <p>As a wholly-owned subsidiary of Yellow River Hydropower, the Entity is responsible only for operations and management, with all funding coordinated by the parent group. The land used by the Entity is leased, and there is currently no plan for closure, retirement, or divestment, and no such activities have occurred to date.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has established requirements for sustainability reporting in the ASI Management Manual and has developed and implemented Policies, systems, and procedures that comply with sustainability</p>

CRITERION	RATING	COMMENT
		<p>reporting standards. The 2024 Sustainability Report, published in February 2025, includes the Entity profile, corporate governance, operational analysis, Human Rights and Labour Rights, environmental protection and Occupational Health and Safety (OH&S) management principles, Anti-Corruption principles, product performance indicators, social responsibility reports, and the Entity's future responsibilities and development plans.</p> <p>The Entity discloses its annual Sustainability Report at: http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045898.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has established Compliance requirements and accountability mechanisms in the ASI Management Manual. Compliance serves as an indicator of management's ability to ensure that operations meet performance benchmarks and adhere to applicable governance, environmental, and social laws and regulations. During the most recent annual review, no significant fines, court rulings, penalties, or non-penalty sanctions resulting from legal violations were identified.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has established requirements for payments to Governments in the ASI Management Manual and has developed and implemented Policies, systems, procedures, and processes that comply with these Anti-Corruption requirements. Any payment made to the government follows Applicable Laws and contractual obligations, with financial records maintained for each payment and regular audits conducted to ensure legality.</p> <p>The Entity pays all applicable taxes, including value-added tax, urban maintenance and construction tax, education surcharges, environmental protection tax, land use tax, stamp duty, enterprise income tax, property tax, and withholding personal income tax, in Compliance with national laws and regulations. All financial and in-kind contributions, including political contributions provided directly or through intermediaries, are publicly disclosed in the Entity's Sustainability Report, available at: http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045898.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established requirements for Stakeholder complaints, appeals, and information requests in the ASI Management Manual. The Control Procedures for Consultation, Communication and Information Exchange have been developed, and the Human Resources Department has designated a labour and personnel supervisor to track Stakeholder requests and complaints, with an appropriate resolution mechanism in place. The Entity provides a dedicated telephone number and email address for the receipt of inquiries, complaints, and appeals from internal and external Stakeholders.</p> <p>The HSE Department and Office are responsible for receiving feedback on corporate governance, safety, environmental protection, and other matters, ensuring timely communication to relevant personnel, and providing prompt responses.</p> <p>The Entity's complaint resolution mechanism, including supporting documents such as the Information Contact Processing Sheet, operates continuously and is reviewed annually through internal audits and management reviews. The Management Manual also stipulates that the mechanism should be reviewed whenever organisational changes affect substantive environmental, social, or</p>

CRITERION	RATING	COMMENT
		<p>governance risks, or when control deficiencies are identified. No such changes or deficiencies have occurred.</p> <p>The Entity has disclosed its latest version of the complaint resolution mechanism at: http://www.hhsd.com.cn/upload/files/2024-07-18/file_1721290982.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has considered the environmental impacts throughout the entire life cycle of Aluminium Products. The Aluminium Life Cycle Environmental Impact Assessment Report has been prepared, and a Life Cycle Assessment (LCA) has been conducted.</p> <p>The LCA Report however has some limitations. For the main purchased raw materials, primary data were not used; instead, data from the database were applied. Similarly, anode carbon blocks, which are produced internally, were assessed using database data rather than actual production data. Additionally, the selection of emission factors, particularly for electricity, is not yet clearly defined.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has prepared the Aluminium Life Cycle Environmental Impact Assessment Report. Upon customer request, LCA information is generally provided as an attachment to the contract. The Report is also publicly available at: http://www.hhsd.com.cn/upload/files/2025-09-28/file_1759025595.pdf</p>
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 Process Scrap targets, which are assigned to each process and are assessed monthly, with targets predominantly being achieved. Procedures are also in place to classify and treat different types of Aluminium Scrap, and in accordance with these procedures, 100% of process waste is recycled.
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.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established requirements for disclosing Greenhouse Gas (GHG) emissions and energy usage in its ASI Management Manual. The 2024 Greenhouse Gas Emission Report (Aluminium Smelting Industry), issued by the State Power Investment Corporation's Carbon Asset Management Co., Ltd. in May 2025, has been provided, The Entity has disclosed both the 2024 annual energy utilisation report and the 2024 Greenhouse Gas emission report, which are available at: http://www.hhsd.com.cn/upload/files/2025-07-04/file_1751620261.pdf and</p>

CRITERION	RATING	COMMENT
		<p>http://www.hhsd.com.cn/upload/files/2025-07-10/file_1752130805.pdf The Entity's 'green electricity' proportion is 90.3%.</p> <p>The Entity's Greenhouse Gas (GHG) Report, however, has not been verified by a Third Party.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity's Greenhouse Gas emission and verification reports indicate its GHG emission intensity over the past three years (2022-2024) was below 11.0 t CO ₂ e/t Al, meeting the average emission intensity requirements. This was achieved with a power mix primarily composed of renewable energy, predominantly hydro power.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has developed a Target Emission Reduction Path for Temperature Rise below 1.5°C, using the ASI decarbonisation pathway tool. This target and methodology have been publicly disclosed at: http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045121.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has developed an Emission Reduction Plan and Pathway, adopting the ASI decarbonisation pathway tool. The GHG emissions reduction pathway includes an intermediate target spanning no more than five years, with 2024 set as the baseline year, available at: http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045121.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented a review and management plan to oversee its Greenhouse Gas emission reduction plan and assess whether actual emission reductions meet the established targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity's pollution discharge permit specifies the names of air outlets, types of pollutants, and allowable emission concentration limits. The Entity conducts regular air emission monitoring as required, and all emissions currently meet local legal standards. The Entity has also developed a 2024 Pollutant Discharge Plan and 2025 Energy Conservation and Emission Reduction Measures document, both of which are reviewed annually. Both documents are available at: http://www.hhsd.com.cn/upload/files/2025-07-10/file_1752130904.pdf
6.2a-g Discharges to Water	Conformance	The Entity's production wastewater is fully recycled after treatment at the on-site sewage treatment station and is not discharged externally. Only domestic sewage is generated, which is monitored twice a year, with all results meeting regulatory requirements. The Entity has established a Water Resources Conservation, Utilization, and Emission Reduction Plan, which is reviewed annually and updated in response to major changes or any instances of non-Compliance. Monitoring reports currently demonstrate that no exceedances have occurred in the past three years. This information is available at: http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045008.pdf

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established an Emergency Response Plan for Sudden Environmental Incidents (filed with the Environmental Protection and Safety Production Supervision Division of the Ganhe Industrial Park Management Committee, Xining Economic and Technological Development Zone in January 2023), and is reviewed every three years.</p> <p>During operations where leaks or seepage may occur, the Plan is implemented in accordance with risk classification standards and corresponding hazard-specific emergency procedures. No Leakage incidents had occurred during the certification period. A comprehensive list of Leakage/Risk Identification and Management Plans is available at: http://www.hhsd.com.cn/upload/files/2025-07-04/file_1751620671.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established necessary procedures, systems, and emergency response plans to manage and disclose Spills and Leakages in accordance with ASI requirements. Although no Spills or Leakage incidents have occurred during the certification period, the Entity's procedures require that any future Spill or Leakage be reported and disclosed in accordance with applicable requirements.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established and implemented an Environmental Management System that includes a comprehensive Waste management strategy. A Waste Management Procedure has been developed, and the Entity has publicly disclosed the annual volume of Waste generated and the corresponding disposal methods, available at: http://www.hhsd.com.cn/upload/files/2025-05-21/file_1747814059.pdf http://www.hhsd.com.cn/upload/files/2025-05-21/file_1747814111.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>Spent Pot Lining (SPL) generated by the Entity is classified as Hazardous Waste and is fully declared, transferred, and disposed of through the Qinghai Industrial Solid Waste Internet of Things Big Data System. Since its establishment, the Entity has neither buried SPL nor discharged it into any freshwater or marine environment.</p>
6.8a-d Dross	Conformance	<p>Dross generated by the Entity is comprehensively utilised, with Aluminium recycled to the greatest extent possible. The resulting secondary Dross is classified as Hazardous Waste and is entrusted to a qualified unit for disposal, with all transfers and disposals declared through the Qinghai Industrial Solid Waste Internet of Things Big Data System. The Entity's 2025 Hazardous Waste Management Plan is available at: http://www.hhsd.com.cn/upload/files/2025-05-21/file_1747814111.pdf</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity receives production and domestic water from the water company of Ganhe Industrial Park. The water source and quantity are approved by the relevant government authorities, and under the overall planning of the Ganhe Industrial Park Management Committee and Ganhe water company. The water supply meets the long-term needs of the Entity.</p>

CRITERION	RATING	COMMENT
		All production wastewater is treated and reused by the Entity's wastewater treatment station, while domestic sewage is collected by the urban sewage network and treated at the park's sewage treatment plant. Evaluations indicate that the Entity's water consumption and wastewater discharge have minimal impact on the surrounding environment. The Water Consumption and Water Risk Assessment for Production and Life and the Water Resources Conservation, Utilisation, and Emission Reduction Scheme have been disclosed at: http://www.hhsd.com.cn/upload/files/2025-05-21/file_1747814303.pdf and http://www.hhsd.com.cn/upload/files/2025-07-09/file_1752045008.pdf

7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as no significant water-related risks have been identified within the Entity's Area of Influence.
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8. BIODIVERSITY AND ECOSYSTEM SERVICES

8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has completed an analysis of ecological impact factors in the Environmental Impact Assessment Report of the Present Situation, which was conducted by a Third Party. The Entity is not located in or near any Protected Area and poses no significant risk or impact on Biodiversity. The overall risk to Biodiversity has been assessed as low.
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8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
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8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
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8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the documented risk assessment indicates that the potential impacts on ecosystem services are low.
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8.4 Alien Species	Conformance	The Entity conducts annual evaluations of Alien Species and implements control measures for high-risk species. No Alien Species have been introduced.
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8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located outside any World Heritage Site and has committed not to explore or develop New Projects within such sites.
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8.6a-d Protected Areas	Conformance	The Entity is located in an industrial park which was developed by the local Government, and there are no Protected Areas in the vicinity.
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8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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9. HUMAN RIGHTS

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has committed to respecting Human Rights and has established a Human Rights Policy Commitment Letter, which is publicly disclosed at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691047712.pdf</p> <p>The Entity has also developed and implemented the Human Rights Due Diligence Procedure and uses a Human Rights Due Diligence questionnaire to identify and assess Human Rights risks. Relevant procedures are reviewed annually, and the Due Diligence process is reassessed whenever there are organisational changes or indications of control deficiencies. No such issues have been identified in the Entity to date.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed a Management Procedure for the Protection of Female Workers to ensure that the rights and interests of women are respected. The effectiveness of these protective measures is publicly disclosed at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691048048.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.
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 within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.
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 within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has established and implements the Procedures for Handling Cultural and Religious Sites to monitor local sites and implement appropriate protective measures as needed.
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 within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or Major Changes that could cause Displacement since joining ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented a Stakeholder Management Procedure, respecting the legal and customary rights of local communities regarding land, livelihoods, and natural resource use. There are no conflicts with surrounding villages over land use, customs, or other matters. Control measures have been formulated and implemented to address any identified impacts on the local community, and no complaints have been received to date.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity's ASI Performance Standard Manual requires that the Entity must not contribute to armed conflict or violate Human Rights. The Entity annually checks whether its Business operations or direct raw material suppliers are located in Conflict-Affected and High-Risk Areas (CAHRAs) and commits not to participate in conflicts directly or through Business relationships. The Entity has also conducted Due Diligence and risk assessments to manage any potential impacts.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Alumina used by the Entity primarily comes from producers and third-party traders, constituting indirect procurement. The Entity verifies its List of Qualified Suppliers, ensuring that none are located in CAHRAs. To identify and assess potential risks, the Entity has conducted annual supplier performance surveys and provided the Supplier ASI Performance Questionnaire.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity as its Supplier ASI Performance Questionnaire has not identified any material impacts from commercial activities in CAHRAs.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity reviews its procurement control procedures annually as part of ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018 certification audits to assess their suitability and effectiveness. This ASI Audit also contributes to the review of the Entity's Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity conducts annual Due Diligence on suppliers and traders, using the Supplier ASI Performance Questionnaire to assess whether any suppliers or direct raw material sources contribute to armed conflict or Human Rights violations in CAHRAs.
9.9 Security practice	Conformance	The Entity has established and implemented Security Management Regulations that define the responsibilities of security personnel and provide training to ensure they understand their duties and respect Human Rights. No complaints or allegations concerning security have been reported to date.
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 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 in accordance with Chinese Applicable Law. Workers are allowed to freely choose their own representatives. The Entity assists departments in electing employee representatives, who are responsible for supervising and reporting issues related to safety, health, welfare, and social management issues to management.
10.2a-c Child Labour	Conformance	The Entity has established and implemented the Child Labour and Minor Workers Management Procedure, which prohibits the employment of child and underage Workers. The Entity employs no child or underage Workers, and the youngest Worker is over 18 years old.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	The Entity has established and implemented the Forced Labour Management Procedures, which prohibit Forced Labour and Human Trafficking, forbid security or deposit requirements for employees, do not restrict Workers' freedom of movement in the workplace, and respect employees' reasonable control over their time. These procedures are implemented in Compliance with the Entity's ASI Performance Standard Manual. For more information, refer to: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691048122.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established and implemented a Discrimination Management Procedure, established a monitoring mechanism and ensures that the principle of non-Discrimination is upheld in all Business activities through a Human Rights Due Diligence process.
10.5 Communication and engagement	Conformance	The Entity establishes and implements the Management Procedure for Consultation, Communication, and Information Exchange, encourages employee participation in the ASI Management System, and facilitates for direct contact with employees and Safety Production Management Committee representatives to address issues.
10.6a-g Violence and Harassment	Conformance	In accordance with the Management Procedure for Punitive Measures, the Entity has established a Policy prohibiting Violence and Harassment in the workplace. The Policy is available at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691048147.pdf
10.7a-c Remuneration	Conformance	The Entity ensures that wages and benefits fully comply with all Applicable Laws and are paid in a manner convenient for employees. All employees receive Overtime pay in accordance with national labour regulations.
10.8a-c Working Time	Conformance	The Entity has set employee working hours in Compliance with national laws, regulations, and labour contracts. Overtime is minimal, voluntary, and compensated according to applicable regulations.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights and ensures their protection. The Entity ensures employees are aware of their rights through Workers' congresses and Labour Unions. Employees can also access information on their rights and obligations via letters, emails, phone calls, interviews, and other channels.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System which has certified to ISO 45001:2018. On-site observations, document reviews, and employee interviews confirm the effectiveness of the Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity regularly reviews its Occupational Health and Safety (OH&S) Management System through production safety meetings, annual Compliance evaluations, ISO 45001:2018 internal audits, and management review activities. Both the Management System and Policies are updated whenever changes or control deficiencies are identified. All OH&S targets for 2024-2025 have been achieved. The Entity discloses its health, safety and environmental performance at: http://www.hhsd.com.cn/upload/files/2025-07-10/file_1752131002.pdf

CRITERION	RATING	COMMENT
		Disclosure relating to leading and lagging performance indicators and peer comparisons however is limited.
11.2 Employee engagement on Health and Safety	Conformance	Through Labor Unions, safety committees, employee representatives, and other mechanisms, the Entity regularly provides feedback to management and participates in discussing and resolving OH&S issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 November 2023	Initial Certification Audit – Full Certification
1	21 August 2024	Update to include findings associated with Criteria 4.4d and 6.8 that are additionally applicable with the Supply Chain Activity of ‘Casthouses’
2	2 December 2025	Surveillance Audit