ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Shandong Hontron Aluminum Industry Holding Company Limited.

CERTIFICATE NUMBER

240

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE

8 DECEMBER 2025

DATE OF EXPIRY

7 DECEMBER 2028

CERTIFIED SINCE

8 DECEMBER 2022

AUTHORISED BY

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

CERTIFICATION SCOPE

Activities of Shandong Hontron Aluminum Industry Holding Company Limited. (China) and its wholly owned subsidiaries Binzhou Hongbo Aluminum Foil Technology Co., Ltd. (China), Zouping Hongcheng Aluminum Technology Co., Ltd. (China), and Zouping Hongzhuo Aluminum Co., Ltd. (China), covering the R&D, production and sale of Aluminium sheets, strips, and foils.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	China Hongqiao Group Co., Ltd.
ENTITY NAME	Shandong Hontron Aluminum Industry Holding Company Limited
CERTIFICATION SCOPE	Activities of Shandong Hontron Aluminum Industry Holding Company Limited. (China) and its wholly owned subsidiaries Binzhou Hongbo Aluminum Foil Technology Co., Ltd. (China), Zouping Hongcheng Aluminum Technology Co., Ltd. (China), and Zouping Hongzhuo Aluminum Co., Ltd. (China), covering the R&D, production and sale of Aluminium sheets, strips, and foils.
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (17 – 21 October 2022) • Surveillance Audit (18 – 19 April 2024) • Re-Certification Audit and Scope Change (5 – 8 August 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 17 – 21 October 2022 (Initial Certification Audit) • 18 – 19 April 2024 (Surveillance Audit) • 5 – 8 August 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	• 8 November 2022 (Initial Certification Audit) • 14 May 2024 (Surveillance Audit) • 16 October 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	Initial Certification Audit (17 – 22 October 2022) The Audit Scope covers all activities of Shandong Hontron Aluminum Industry Holding Company Limited. and its wholly owned subsidiaries Binzhou Hongbo Aluminum Foil Technology Co., Ltd., Zouping Hongcheng Aluminum Technology Co., Ltd., and Zouping Hongzhuo Aluminum Co., Ltd. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication All relevant Criteria in the ASI Performance Standard are included in the Audit Scope. Surveillance Audit (18 – 19 April 2024) The Audit Scope covers all activities of Shandong Hontron Aluminum Industry Holding Company Limited. and its wholly owned subsidiaries Binzhou Hongbo

	Aluminum Foil Technology Company Limited., Zouping Hongcheng Aluminum Technology Co., Ltd., and Zouping Hongzhuo Aluminum Co., Ltd. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication All relevant Criteria in the ASI Performance Standard are included in the Audit Scope. Re-Certification Audit and Scope Change (5 – 8 August 2025) The Audit Scope covered all activities of Shandong Hontron Aluminum Industry Holding Company Limited, and its wholly owned subsidiaries Binzhou Hongbo Aluminum Foil Technology Co., Ltd., Zouping Hongcheng Aluminum Technology Co., Ltd., and Zouping Hongzhuo Aluminum Co., Ltd. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication All relevant Criteria in the ASI Performance Standard are included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	8 December 2025 – 7 December 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	7 December 2028
CERTIFICATE NUMBER	240
	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

The 'Entity' consists of Shandong Hontron Aluminum Industry Holding Company Limited., located in Boxing, Shandong, China and three wholly owned subsidiaries including Binzhou Hongbo Aluminum Foil Technology Co., Ltd. (in Boxing, Shandong, China), Zouping Hongcheng Aluminum Technology Co., Ltd. (in Zouping, Shandong, China), and Zouping Hongzhuo Aluminum Co., Ltd. (Zouping, Shandong, China). The facilities are mainly engaged in Research and Development (R&D), production and sales of Aluminium sheets, strips, and foils with the main processes include remelting, casting and rolling, cold rolling, foil rolling, finishing (slitting) and annealing.

There are presently 22 casting and rolling lines, five cold rolling lines, and 14 foil rolling production lines operating, with an annual production capacity of 200,000 tonnes of cast rolling plates, 200,000 tonnes of cold rolling plates, and 120,000 tonnes of Aluminium foil. The main products include pharmaceutical foil, household foil, container foil, decorative foil, battery foil, and cable foil.

Since 2021, the Entity has not developed any new projects or undergone significant changes, and the Entity's environmental, social and governance related risks are relatively low.

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	High	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented comprehensive Policies, systems, procedures, and processes to ensure Compliance with Applicable Law, regulations, and customer requirements. The Environmental Protection and Safety Department and the Human Resources Department are responsible for overseeing Compliance within their respective areas and conducting annual legal compliance reviews. All Applicable Laws, regulations, and requirements have been identified, and no significant Compliance issues have been reported. Details of the Entity's performance are outlined in its annual compliance statement.
1.2 Anti-Corruption	Conformance	The Entity has developed and implemented Policies and procedures to identify and prevent Corruption, in accordance with the controlling shareholder Hongqiao's Integrity Management and Anti-Corruption Policy. These Policies and procedures are adhered to, in line with Applicable Law. Positions with a high risk of Corruption have been identified, and control measures, including the signing of anti-Corruption commitment letters, have been implemented. The Group's Audit and Supervision Department is responsible for conducting annual anti-Corruption audits. Over the past three years, no instances of Corruption or serious violations have been reported, as confirmed by the Entity's Misconduct Registry and periodic internal control audit reports.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that outlines principles related to environmental, social, and governance performance. To promote awareness, the Entity has taken adequate measures, including training and communication, to ensure business partners and suppliers understand and adhere to the Code. The Code of Conduct is available to all interested Stakeholders at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司ASI行为准则-4475a200-cf09-48a7-968c-0758cc0b4e1b.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established comprehensive Environmental, Social, and Governance (ESG) Policies, which are formally approved by senior management to ensure alignment with the ASI Performance Standard. These Policies have been communicated to employees internally and publicly disclosed on the Entity's website at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司环境、社会和治理管理方针-a9dae9ed-da11-440e-b7e2-8afe5d3c5434.pdf The Entity conducts annual reviews of the applicability, completeness, and effectiveness of these Policies through internal audits and management reviews to identify areas for improvement. In addition, the Entity is committed to the prompt review of its ESG Policies in response to significant business changes affecting ESG risks or the identification of control deficiencies.
2.2a-c Leadership	Conformance	The Entity has appointed the Deputy General Manager in charge of production operations as the ASI Management Representative. This

CRITERION	RATING	COMMENT
		appointment ensures the provision of adequate resource support for the operation of the ASI Management System. To provide support for the implementation of the ASI management procedures, the Entity has established a cross-departmental ASI Working Group. The ASI-related Policies and management processes are systematically communicated to employees through targeted training programmes, ensuring that all staff have a clear understanding and awareness of the relevant requirements.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System. Three of the sites hold a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management System to address social and Occupational Health and Safety impacts. These impacts are identified and assessed, with corresponding management measures developed and implemented to prevent or mitigate them effectively.
2.4a-e Responsible Sourcing	Conformance	The Entity enforces the Supplier Code of Conduct and conducts second-party Due Diligence audits at major next-tier suppliers' sites as part of the qualification process. The procurement team and relevant personnel receive annual training on responsible sourcing requirements. The Purchasing Policies are publicly accessible at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司供应商行为准则-5e574aca-4847-4eb1-8658-953bbaa599b9.pdf In accordance with the Entity's documented ASI management procedure, the purchasing Policies are subject to periodic review during management review meetings and updated as necessary in response to significant changes in business operations that affect environmental, social, or governance risks, or when control deficiencies are identified.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since the last ASI Audit. The Entity has implemented ISO 14001 and ISO 45001 Management Systems, with annual reviews and updates to environmental aspects, health and safety risks, and control plans. Information on Environmental and Social Impact Assessments, along with related management plans, is publicly disclosed in the Group's 2024 ESG Report, under sections 'Materiality Analysis', 'Environmental Protection' and 'Community Management', available at: http://www.hongqiaochina.com/Uploads/File/2025/04/13/C25011015-Hongqiao-ESG24%20(1).20250413205743.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since the last ASI Audit. The Entity has established procedures to identify, assess, and manage risks related to Human Rights and business ethics, aligning with the ASI Performance Standard and legal requirements, and conducts annual labour and Human Rights Impact Assessments under the 'Labor and Human Rights Risk Assessment Management Procedure'. The Entity also demonstrates transparency by preparing and disclosing Human Rights management practices in its Human Rights Impact Assessment Report.

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Response Plans developed in collaboration with Stakeholder groups to address fire, hazardous chemical leaks, extreme weather, and key equipment breakdown including a resumption plan. The Emergency Response Plans on social, OH&S and environmental incidents have been implemented, and relevant personnel have received training on these plans. Based on the nature of the Entity's production processes and the distance to the neighbouring communities, the Entity publicly discloses a summary of the Emergency Response Plan, available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E5%BA%94%E6%80%A5%E5%93%8D%E5%BA%94%E8%AE%A1%E5%88%92-34babf28-947a-4fe4-a53a-d98cf49ffbc0.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan to manage situations that require the suspension or significant alteration of operations due to external factors. The Entity is committed to complying with Applicable Law and company Policies on layoffs while consulting employee organisations as required. The Plan is subject to review in the event of Material environmental, social, or governance risks arising from business changes or identified control gaps and is reviewed every 18 to 24 months. No suspension activities have occurred in the past three years.
2.9a-b Mergers and Acquisitions	Conformance	As a subsidiary of Hongqiao, the Entity operates under the strategic direction of its parent company, with decisions regarding Mergers and Acquisitions (M&A) determined at Group headquarters level. The Entity is responsible for the implementation of M&A projects and adheres to the 'Merger and Acquisition Process Management Regulations' established by the parent company. In the event of an M&A, the Entity conducts Due Diligence to review ESG practices in alignment with the ASI Performance Standard, including those related to historical Aluminium operations. In 2025, the Entity conducted financial and ESG Due Diligence for the acquisition of Hongtuo Group. The Entity has committed, following this acquisition, to share information on the Material impacts of past Aluminium business operations with affected communities and institutions, and implement control plans to mitigate any identified Material impacts arising from past Aluminium business operations.
2.10a-b Closure, Decommissioning and Divestment	Conformance	As a subsidiary of Hongqiao, the Entity executes closure, decommissioning, and divestment projects based on decisions made at Group level. The Entity adheres to the Group's 'Environmental, Social, and Governance Management Regulations for Closure, Decommissioning, and Divestment', ensuring ESG practices are reviewed and significant impacts are monitored during planning. No such activities have occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	As a subsidiary of the Hongqiao Group, the Entity's sustainability management and annual performance information is included in the Group's annual reporting. The Group's 2024 ESG Report has been prepared in accordance with the Hong Kong Stock Exchange's Environmental, Social, and Governance Reporting Guide and the

CRITERION	RATING	COMMENT
		Global Reporting Initiative (GRI) Standards. The Report provides information on key performance indicators including ESG risk analysis, governance practices, local economic contributions, Human Rights, environmental and OH&S indicators, accident statistics, community engagement, and legal compliance. The 2024 ESG Report is available at: http://www.hongqiaoxc.com/Uploads/File/2025/04/13/C25011015-Hongqiao-ESG24%20(1).20250413205743.pdf
3.2 Non-compliance and Liabilities	Conformance	As a subsidiary of Hongqiao, the Entity complies with information disclosure requirements for listed companies. The Entity is listed on the Shenzhen Stock Exchange, and reports on 'violations and responsibilities' in its annual financial reports. Additionally, the Entity conducts an annual Compliance evaluation to assess adherence to regulations and standards, with results publicly disclosed in the ASI Information Disclosure, available at: http://www.hongqiaoxc.com/investors_xxpl.html There have been no significant fines or penalties reported in last three years.
3.3a-c Payments to Governments	Conformance	The Entity has not, nor on its behalf, made payments to Governments other than on a legal and/or contractual basis. The Entity's semi-annual/annual Financial Report is publicly disclosed, as legally required, at: http://www.hongqiaoxc.com/Uploads/File/2025/04/11/C24120936-Hongqiao-AR24.20250411194704.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's parent company, Hongqiao Group, has established a comprehensive system for the management of complaints and appeals. The Corporate Management Department is responsible for overseeing this process, collaborating with other departments such as Party and Public Affairs, Audit and Supervision, Sales, Procurement, and Human Resources to address feedback from employees and external Stakeholders. The Entity has established a system of complaints and inquiry reception, comprising a suggestion box, email address (hchr@hontron.com), and a hotline (+86- 0543-7026000). The process is described in the Stakeholder Complaint Handling Policy, available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司利益相关方投诉处理制度-62455l5e-8803-4ea4-b3dd-c3630514e06f.pdf To date, no significant complaints have been received.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has conducted a Life Cycle Assessment (LCA) of its primary Product, Aluminium foil, using a 'cradle-to-gate' model. This assessment was informed by the Entity's ISO 14001 Environmental Management System and the Greenhouse Gases (GHG) inventory results under ISO 14064. The analysis indicates that the life cycle environmental impact of the Entity's Products is primarily reflected in GHG emissions, with significant environmental impact occurring in the upstream raw material production stage, particularly during the

CRITERION	RATING	COMMENT
		Aluminium electrolysis process. Conversely, the environmental impact generated within the Entity's operations is relatively insignificant. The Entity's LCA report indicates however that the LCA process should incorporate more quantitative data analysis to enhance the reliability and completeness of the LCA conclusions.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The assessment of the 'cradle-to-gate' life cycle impacts of the Entity's main Products is available to the public at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司产品生命周期报告-417e8dee-426f-4b6e-90ba-0ff6dc95bec9.pdf The Entity is committed to providing its clients with 'cradle-to-gate' LCA information on its Aluminium Products in accordance with the requirements of the applicable contract and upon request. To date, no such request has been received. Specific LCA-related information, including acidification potential and sensitivity analysis, however, has not been disclosed in the publicly available LCA report.
4.2 Product Design	Conformance	The Entity has incorporated objectives into its Product design and development processes with a view to enhancing Circular Economy performance, including the environmental life cycle impacts of the final Products. During each product development process, several factors are given consideration, including energy consumption, proportion of Recycled Aluminium used, use of renewable energy, and the reduction of Scrap and its recycling.
4.3a-b Aluminium Process Scrap	Conformance	The Entity aims to achieve 100% collection, recycling, and reuse of Aluminium processing waste, supported by documented procedures. To reduce Scrap, measures implemented include strict control of process parameters, employee training, and regular equipment maintenance. Non-recyclable Dross is maintained at negligible levels and 'closed-loop' recycling facilities ensure nearly all Process Scrap is recycled. Preliminary investigations indicate the Entity has largely met its goal of 100% waste collection, recycling, and reuse.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established a 200,000 tonne End of Life Aluminium recycling plant and actively collaborates with local and regional Aluminium Scrap recyclers to gradually increase the use of Recycled Aluminium. This effort aims to support accurate measurement and continuous improvement of the recycling rate of Aluminium-containing products in relevant markets. The Entity's recycling strategy is available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司报废产品收集和回收利用-10bfdfe5-a0ac-45ee-a4b2-abcf18457648.pdf
5. GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has calculated its Material Greenhouse Gas (GHG) emissions following the accounting protocol and covering Scopes 1 and 2 and the major Scope 3 emissions including purchased raw materials and transportation. The Entity's 2024 GHG Emissions Report was verified by a Third Party with a supporting verification statement. The 2024 GHG Verification Report is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B82024%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93GHG%E7%9B%98%E6%9F%A5%E6%8A%A5%E5%91%8A-917cb6f1-d86b-4888-8b71-55d6dc00631f.pdf For purchased products, the Entity however did not use the suppliers' emissions data and no explanation was provided.
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 Hongqiao Group has established an overall strategy on GHG emissions to align with China's national strategy, including peak carbon by 2030 and carbon neutrality by 2060. The Entity has established a GHG Emissions Reduction Pathway using the ASI Entity GHG Pathway Calculation Tool with a 2024 baseline year and outlines GHG emissions reduction targets over a five-year period with corresponding emissions management programs. As a 2024 baseline year has been adopted, the Entity was not required to demonstrate performance at this Audit.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Pathway using the ASI Entity GHG Pathway Calculation Tool with a 2024 baseline year and outlines GHG emissions reduction targets over a five-year period with corresponding emissions management programs. The Entity has implemented a process to review the performance status of its GHG emissions reduction targets annually, or following any major changes. The Entity's GHG Emissions Reduction Pathway and Plan is available at: http://www.hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92%E5%8F%8A%E8%B7%AF%E5%BE%84-be0a6e85-9807-4acf-a235-f4eda58af7cb.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established a procedure for the annual calculation of GHG emissions. To achieve its GHG emissions reduction targets, the Entity has established and implements management processes to improve energy efficiency and reduce energy waste in daily operations, introduce renewable energy sources and increase

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		purchasing of 'low carbon' alloy and Aluminium ingots. All measures are monitored periodically to ensure their ongoing effectiveness.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has conducted an Environmental Impact Assessment (EIA) to identify and quantify the Emissions to Air that have adverse effects on humans or the environment. Emissions treatment facilities are installed, and monitoring of air emissions are undertaken at the required intervals. The monitoring results in 2024 and 2025 indicate emissions are lower than the legal emission limit. In accordance with the ISO 14001 Management System requirements, the Entity's operational measures are reviewed annually by periodical monitoring, internal audits and during management reviews. The Entity's Air Pollution Reduction Plan is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88-777fa7eb-4c71-4340-8455-e4daa7d62fe2.pdf
6.2a-g Discharges to Water	Conformance	The Entity has identified and quantified the Material discharges to water from its activities and implements an Environmental Management System to manage Discharges to Water. The Entity has established water reduction targets and implemented a related plan to minimise adverse impacts. Major pollutants are monitored, and wastewater monitoring results indicate pollutants meet the local legal discharge limit. In accordance with the ISO 14001 Management System requirements, the Entity's operational measures are reviewed annually via periodical monitoring, internal audits and during management reviews. The Entity's Water Pollutant Reduction Plan is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88-a55fdb17-eb5e-4b69-893d-a0403b998b1d.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	An assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil has been undertaken by following the risk assessment process for the Environmental Management System. The Entity has implemented the Emergency Response Plan for environmental incidents in which the control methods for identified Spills or Leakages are defined. The required Spill management facilities are in good order. The Entity has provided training on the Plan to the relevant Workers and has conducted emergency drills. The Emergency Response Plans are reviewed every three years, and registered with the local environment protection agency. The Risk Assessment Report, which includes control measures, is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B3%84%E9%9C%B2%E6%B8%97%E6%BC%8

CRITERION	RATING	COMMENT
		F%E9%A3%8E%E9%99%A9%E8%AF%86%E5%88%AB%E8%A1%A8-b4306542-99b7-4211-bab2-d97697fac893.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The process to report Spills and Leakage is defined in the Entity's Emergency Response Plan. No Spills or Leakages have occurred in the past three years, as confirmed via a review of online registers of the local Environmental Protection Bureau and Non-Government Organisations.
6.5a-c Waste Management and Reporting	Conformance	The Entity has identified and quantified the Hazardous and Non-Hazardous Waste generated from its activities and assessed the Material impacts to human well-being and the environment. The Entity has implemented a Waste management strategy according to the Waste Mitigation Hierarchy. All Hazardous Wastes are transferred to qualified suppliers for disposal. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity in 2024 is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E5%8D%B1%E9%99%A9%E5%BA%9F%E5%BC%83%E7%89%A9%E4%B8%8E%E4%B8%80%E8%88%AC%E5%9B%BA%E5%BA%9F%E7%AE%A1%E7%90%86%E6%83%85%E5%86%B5-a564c2a6-45ab-43c4-9711-1951809aa889.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	Dross is classified as a Hazardous Waste in China and the Entity's management process adheres to the applicable legal requirements. The Entity pre-processes Dross before transfer for disposal, and all Aluminium recovered from the Dross is recycled. Dross residues are transferred to licensed supplier for disposal, and no Dross residues are landfilled.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and mapped its water withdrawal and use. The Entity only sources water from the municipal water supply and identifies its discharge and consumption by source. A water balance analysis has been conducted. The Entity has conducted a water risk assessment that has considered its Area of Influence. Due to the nature of the Entity's Products and production processes, the level of water-related risk is determined as low. The Water Resources Risk Assessment is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E6%B0%B4%E8%B5%84%E6%BA%90%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A-f2f93468-9aae-429e-8f8a-226e65a7fa43.pdf

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant water-related risks in the Entity's Area of Influence were identified.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	As a part of the EIA, the impact on Biodiversity and Ecosystem Services by the Entity's operations was assessed by a qualified Third Party. The EIA is approved by the local Environmental Protection Bureau. Additionally, the Entity has undertaken a 'stand-alone' risk assessment that was compiled to assess the risk and Materiality of the impacts on Biodiversity and Ecosystem Services from the land use and activities in its Area of Influence. These assessments determined that there is no significant risk or impact on Biodiversity due to the nature of the Entity's Products, the production processes and the locations of the Entity's sites. The Entity's Biodiversity and Ecosystem Services Risk Assessment Report is publicly disclosed at: http://www.hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E7%94%9F%E7%89%A9%E5%A4%9A%E6%A0%B7%E6%80%A7%E5%92%8C%E7%94%9F%E6%80%81%E7%B3%BB%E7%BB%9F%E6%9C%8D%E5%8A%A1%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A-07b332cb-bb3d-4c62-bc83-c454ebf0c6c2.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable to the Entity, as the risks and potential impacts identified were assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment did not identify any significant Biodiversity impacts.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified during the risk assessment.
8.4 Alien Species	Conformance	The Entity identified the risk of introducing Alien Species as part of its Biodiversity risk assessment. Risks are limited to the use of wooden pallets, and are managed in a way to avoid the introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity commits to protecting the environment. There are no Protected Areas present within the Entity's Area of Influence.
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	The Entity has established a Corporate Code of Ethical Conduct, emphasising respect for Human Rights and adherence to the UN Guiding Principles on Business and Human Rights. The Entity has publicly disclosed its Code of Conduct, available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司ASI行为准则-4475a200-cf09-48a7-968c-0758cc0b4e1b.pdf The Entity implements a Human Rights Due Diligence process and undertaken an annual review of the applicability, comprehensiveness and effectiveness of its Human Rights Policies and Due Diligence procedures. This review is conducted through management review meetings. The Entity is engaged in community activities and maintains open engagement with Affected Populations and Organisations regarding its Human Rights Policies and Due Diligence efforts. Based on the annual assessment reports, management review records, and Stakeholder grievance logs, the Entity has not caused significant negative impact within its Area of Influence. In instances where adverse Human Rights impacts are identified or reported, the Entity is committed to providing remedies or supporting remediation efforts through legitimate processes. The Human Rights Impact Assessment Report is available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司人权影响报告-56431263-488f-4825-b47e-6202144d37c3.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established comprehensive Policies and management procedures to uphold women's rights and promote gender equality. The Entity conducts annual evaluations of its gender equality initiatives via management reviews and meetings with employee representatives. Related performance metrics are disclosed in the Hongqiao Group's annual ESG Report and the Entity's Gender Equality and Protection of Female Employees' Rights Report, available at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司性别平等和女职工权益保护-80d40582-3edd-4e65-a0ec-65f6f8115008.pdf Between 2023 and 2025, no complaints concerning gender equity issues were reported.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment developed through Stakeholder engagement determined there are no Indigenous Peoples or their land within its Area of Influence. The Entity has however, established and implemented Policies and processes to ensure respect of the rights and interests of Indigenous Peoples.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment developed through Stakeholder engagement determined there are no Indigenous Peoples or their land within its Area of Influence and therefore Free Prior and Informed Consent (FPIC) is not required.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment developed through Stakeholder engagement determined there are no Indigenous Peoples or their lands within its Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has implemented processes to identify cultural and sacred heritage sites and evaluate risks to reduce potential impacts. Environmental Impact Assessments (EIA) and social stability evaluations have been conducted for all projects, with Stakeholder consultations verifying that no cultural or sacred heritage sites are present within the areas impacted by the Entity's Facilities. These evaluations follow Stakeholder engagement mechanisms and comply with relevant standards and requirements.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, or sacred or cultural heritage sites within the Entity's Area of Influence. The Entity has however, established procedures to identify cultural and sacred heritage sites and conduct risk assessments to minimise potential impacts. If such sites are identified in the future, the Entity is committed to taking appropriate measures to prevent significant impacts on cultural, historical, or spiritual heritage.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as its Facilities are located within industrial sites developed by the local government and there are no residential areas nearby. There have been no New Projects since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Stakeholder engagement process that aims to identify and address the key concerns of Affected Populations and Organisations. Response plans have been formulated, with annual reviews to evaluate progress and implement improvements as required. The performance of the Entity's plans and actions are included in the Hongqiao Group's Annual ESG Report, pages 138-150 and 160-162, available at: http://www.hongqiaochina.com/Uploads/File/2025/04/13/C25011015-Hongqiao-ESG24%20(1).20250413205743.pdf The Entity is committed to the periodic review and revision of its community support programs in response to significant changes in environmental, social, or governance priorities, or when control deficiencies are identified.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established and implemented Management Systems, which include a Supply Chain Policy, defined responsibilities and resources, information gathering mechanisms, and supplier engagement processes. The Entity's ASI Policy, encompassing the Purchasing Policy and the Grievance Mechanism, is publicly disclosed at: Supply Chain Code of Conduct: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司供应商行为准则-5e574aca-4847-4eb1-8658-953bbaa599b9.pdf Annual ESG Report: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司利益相关方投诉处理制度-6245515e-8803-4ea4-b3dd-c3630514e06f.pdf

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity identifies and assesses risks in its supply chain through periodic risk assessments. No conflict minerals are used, no materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs), and no critical Human Rights issues such as Child Labour or Forced Labour have been identified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined that no conflict minerals are used, no materials are from CAHRAs, and no critical Human Rights issues such as Child Labour or Forced Labour have been identified.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity regularly reviews the implementation of its Supplier Code of Conduct and the effectiveness of its Due Diligence processes, promptly addressing any non-compliance identified during the reviews by taking corrective actions. The Entity's Due Diligence practices were independently audited as part of this ASI Audit, which meets the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has successfully traced the material sources of all metal suppliers and confirmed that its raw materials do not originate from CAHRAs. The Entity has not however publicly disclosed the implementation of its supply chain Due Diligence process.
9.9 Security practice	Conformance	All security guards are employees of the Entity, and the Entity is committed to respecting Human Rights in all security-related activities. For example. body searches are not permitted, and security guards are required to perform their duties in a humane manner. All security guards have a clear understanding of their responsibilities and the importance of respecting Human Rights. To date, no grievances or complaints related to security activities have been received.
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 Entity complies with Applicable Law in China related to the right to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's senior management is committed to honouring the right to Freedom of Association and Collective Bargaining. The Entity has an Employee Representative Committee and employees hold democratic elections every five years to select their representatives. Quarterly meetings with Worker representatives and senior management are undertaken ensuring open dialogue and communication. These meetings are used to address and discuss Workers' concerns and issues.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in China, with the legal minimum working age at 16 years. The Entity has established and implemented a Policy to prevent Child Labour and protect young Workers. Currently, there are no instances of Child Labour or young Workers within the Entity.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy prohibiting Forced Labour and Human Trafficking and has committed itself and requires its suppliers to comply with regulations prohibiting Forced Labour, slavery, and

CRITERION	RATING	COMMENT
		Human Trafficking. Following a thorough review, the Entity concluded that there were no instances of illegal wage deductions, debt bondage, debt repayment through labour, or other forms of Forced Labour. The Entity has publicly disclosed a Modern Slavery and Human Trafficking Statement detailing the actions taken to address modern slavery and practical measures and achievements to protect Human Rights, available at: http://hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E5%8F%8D%E7%8E%B0%E4%BB%A3%E5%A5%B4%E9%9A%B6%E5%88%B6%E5%92%8C%E5%8F%8D%E5%AF%B9%E4%BA%BA%E5%8F%A3%E8%B4%A9%E5%8D%96%E5%A3%B0%E6%98%8E-f9e9fc60-ac5c-42b0-be02-9efb81597708.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to maintaining a non-discriminatory workplace. No cases of Discrimination have been reported. Recruitment advertisements and training plans reflect that all decisions are based solely on the candidate's ability to meet job requirements, without consideration of personal characteristics. Interviewed Workers confirmed that they feel they are treated equally within the Entity.
10.5 Communication and engagement	Conformance	Direct and frequent communication with Workers and Worker representatives is established within the Entity. The available communication channels are clearly announced to Workers, allowing them to raise concerns or complaints regarding working conditions, workplace resolutions, compensation issues, and other matters. Workers are assured that these processes are free from any threat of reprisal, intimidation, or Harassment, allowing a safe and open environment for communication.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented clear Policies stating that Harassment or bullying is not tolerated under any circumstances. An informational brochure outlining these Policies has been developed and distributed to all employees to ensure awareness. The Entity's Code of Ethics and Anti-Violence and Anti-Harassment Policy clearly address this issue. Regular training sessions are conducted for employees to reinforce understanding and compliance. The Anti-Violence and Anti-Harassment Policy is accessible to all employees and Stakeholders at: http://www.hontron.com/Upload/ueditor/files/2025-07-29/山东宏创铝业控股股份有限公司反暴力反骚扰政策-134ecacc-a1a1-43fc-8876-dc219aca51e2.pdf
10.7a-c Remuneration	Conformance	The Entity ensures a transparent salary structure, with basic wages exceeding the local statutory minimum standards and Overtime compensation fully meeting legal requirements. The Entity provides fixed allowances and a performance bonus and ensures that all employees are covered by statutory social insurance. Salaries are promptly issued via bank transfer within the legally stipulated pay cycle of the following month. Employees may review detailed information on wages, allowances, Overtime pay, and deductions through the Entity's internal OA system.

CRITERION	RATING	COMMENT
10.8a-c Working Time	Conformance	The Entity accurately records and monitors Workers' working hours to ensure Compliance and safeguard employee well-being. Through implementing a reasonable shift work system, the Entity has ensured that, over the past six months, Workers did not work more than eight hours per day and had, on average, at least one rest day every seven days.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that its Workers are informed of their rights as outlined in its principles, fostering awareness and understanding among employees. To support this, cooperation and communication channels have been established with Workers across all its production plants. Furthermore, the Entity strictly adheres to and complies with national laws and regulations in China, demonstrating its commitment to lawful and ethical practices in its operations.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, maintains and continually improves its Occupational Health and Safety (OH&S) Management System against ISO 45001:2018, which covers all four Facilities, of which three hold valid ISO 45001: 2018 certificates (available at www.cnca.gov.cn). Site observations, document reviews and interviews confirmed the effectiveness of the Entity's OH&S Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically reviews its OH&S Management System during the monthly safety meeting, annual legal compliance evaluation, annual internal audit, and annual management review meeting that adheres to the requirements of ISO 45001:2018. When any indication of a control gap is shown, the review is conducted to assess if the potential corrective and/or preventive actions should be implemented. The Entity's OH&S performance for 2024 and the comparative analyses of performance with peer Businesses and leading practice are publicly disclosed in the OH&S Management System Effectiveness Report: http://www.hontron.com/Upload/ueditor/files/2025-08-15/%E5%B1%B1%E4%B8%9C%E5%AE%8F%E5%88%9B%E9%93%9D%E4%B8%9A%E6%8E%A7%E8%82%A1%E8%82%A1%E4%BB%BD%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E8%81%8C%E4%B8%9A%E5%81%A5%E5%BA%B7%E5%AE%89%E5%85%A8%E4%BD%93%E7%B3%BB%E6%88%90%E6%95%88-b455980d-5213-46a0-91e3-d854c375e2d6.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a system of Workers' consultation and participation in Health and Safety. Workers are encouraged to report their concerns or advice on OH&S issues independently, or to a Worker representative. The management responds to the concerns and advice from Workers on OH&S issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 December 2022	Initial Certification Audit – Full Certification
1	12 June 2024	Surveillance Audit. Change of Entity Name from Shandong Hongchuang Aluminum Industry Holding Co., Ltd. to Shandong Hontron Aluminum Industry Holding Company Limited.
2	28 November 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.1