

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Baotou Aluminium Co., Ltd.

CERTIFICATE NUMBER

330

ASI STANDARD

PERFORMANCE  
STANDARD  
(v3.1 2023)

CERTIFICATION LEVEL

PROVISIONAL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

BUREAU VERITAS  
CERTIFICATION

DATE OF ISSUE

14 JANUARY 2026

DATE OF EXPIRY

13 JANUARY 2027

CERTIFIED SINCE

22 DECEMBER 2023

AUTHORISED BY

CERTIFICATION SCOPE

Aluminium Smelting and Casting at  
Baotou Aluminium Co., Ltd, Inner  
Mongolia, China.

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

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

# AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

MEMBER NAME	Baotou Aluminium Co., Ltd.
ENTITY NAME	Baotou Aluminium Co., Ltd.
CERTIFICATION SCOPE	Aluminium Smelting and Casting at Baotou Aluminium Co., Ltd, Inner Mongolia, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (3 – 7 July 2023)</li><li>• Surveillance Audit and Scope Change (6 – 10 January 2025)</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>• 3 – 7 July 2023 (Initial Certification Audit)</li><li>• 6 – 10 January 2025 (Surveillance Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 23 August 2023 (Initial Certification Audit)</li><li>• 22 February 2025 (Surveillance Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (3 – 7 July 2023)</u></p> <p>The Audit Scope covers the operations at Baotou Aluminium Co., Ltd. and Inner Mongolia Huayun New Material Co., Ltd.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit and Scope Change (6 – 10 January 2025)</u></p> <p>The Audit Scope covers the operations at Baotou Aluminium Co., Ltd.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

---

AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Provisional Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> 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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	14 January 2026 – 13 January 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	13 January 2027
CERTIFICATE NUMBER	330
	<p>If you have an inquiry or complaint about this Certification, go to the third-party Ethics Point portal at: <a href="https://aluminium-stewardship.ethicspoint.com/">https://aluminium-stewardship.ethicspoint.com/</a></p>
<p>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.</p>	
<p>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.</p>	

---

## ENTITY OVERVIEW

Baotou Aluminium Co, Ltd. (the 'Entity'), formerly known as Baotou Aluminium Factory, was founded in 1958. After more than 60 years of development, the Entity has been incorporated into the electrolytic Aluminium base of Aluminium of China (Chinalco) in northern China. It has a production capacity of 0.576 million tonnes of electrolytic Aluminium.

The Entity has certified Management Systems according to ISO 14001:2015, ISO 9001:2015, and ISO 45001:2018. It is a national demonstration enterprise of the recycling economy and is one of the world's largest and only domestic producer of high-purity Aluminium using the segregation method. The technology capacity of its own electricity and electrolytic Aluminium equipment is considered leading in the domestic industry.

The Entity's main products include high purity Aluminium, various Aluminium alloys, Aluminium liquid, and Aluminium ingot, that are mainly used in aerospace, military industry, transportation, engineering and construction. At present, the Entity comprises an electrolytic plant, high purity Aluminium plant, alloy division, solid waste centre, power plant, thermal power plant, overhaul slag plant, and a repair plant. The Entity comprises an electrolytic plant, high purity Aluminium plant, alloy division, solid waste centre, power plant, thermal power plant, overhaul slag plant and a repair plant.

The Entity has over 3,400 employees. Key external Stakeholders include the regional governmental authorities, customers representing major industries, and nearby local communities.

## MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Low	Medium	Medium
<b>RISKS</b>	Medium	Medium	Medium	Medium
<b>PERFORMANCE</b>	Medium	Medium	Medium	Medium
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity has established a management procedure on laws and regulations and complies with national and international laws. It has detailed descriptions for the conduct of internal audits and maintains a list of Applicable Laws. The Entity's EHS Department and Administration Department are responsible for the assessment of Compliance with Applicable Law, which occurs at least annually.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity has established an anti-Corruption and anti-Bribery management procedure, which covers the requirements of anti-Bribery and anti-Corruption. The Entity has established an anti-Bribery management team, who conduct regular assessments. A Bribery risk assessment level standard has been established and employees are regularly trained.</p> <p>The Entity's Administration Department evaluates the implementation of anti-Bribery activities undertaken annually to determine whether anti-Bribery measures are sufficient and effective and revise the Entity's Bribery risk status as required.</p> <p>The Audit noted however that there was a lack of risk identification regarding senior management in the Bribery risk assessment list.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed a Code of Conduct, which addresses environmental, social and governance principles. The Entity conducts annual internal audits and management reviews that include the Code of Conduct. The Code of Conduct is revised upon any change in law and business trends. Staff awareness of the Code of Conduct is raised through various measures, including meetings and training. The Code of Conduct is available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established an Environmental, Social and Governance Policy, which is approved by the plant General Manager, and is publicly available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>The Entity has established an ASI Performance Standard Manual, which includes the Policies and procedures.</p>
2.2a-c Leadership	Minor Non-Conformance	<p>A senior Management Representative has been appointed, and the responsibility and authority are clearly defined. This role has overall responsibility and authority for ensuring conformance with the ASI Performance Standard, implementation and communication of the relevant Policies, and providing the necessary resources to establish, implement, maintain and improve the Management Systems required throughout the ASI Performance Standard.</p> <p>Disclosure-related links on the Entity's website are however unstable.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented an integrated Management System, and has obtained ISO 14001:2015 and ISO 45001:2018 certification. Also, the Entity has established an ASI Management System and internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Responsible Procurement Policy is reviewed at least every five years or after any changes to the Business, or change in risk. The Entity has conducted supplier assessments prior to sourcing and undertakes annual assessments. The Entity's Policies are available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
2.5a-g Environmental and Social Impact Assessments	Conformance	Since the previous Audit, there have been two Major Changes at the Entity, including 1. the 'high-purity Aluminium slag treatment' project and, 2. 'high-quality 'green low-carbon' Aluminium alloy transformation' project. The Entity has prepared an Environmental and Social Impact Assessment, which is disclosed on the website of the Baotou Ecological Environment Bureau: <a href="http://sthji.baotou.gov.cn/gggs/25036495.jhtml">http://sthji.baotou.gov.cn/gggs/25036495.jhtml</a> <a href="http://sthji.baotou.gov.cn/gggs/25055759.jhtml">http://sthji.baotou.gov.cn/gggs/25055759.jhtml</a>
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has established a Human Rights Due Diligence Procedure. Since the previous Audit, there have been two Major Changes at the Entity, including the 'high-purity Aluminium slag treatment' project and 'high-quality 'green low-carbon' Aluminium alloy transformation' project. The Human Rights Impact Assessment, including a gender analysis, was completed and is available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
2.7a-f Emergency Response Plan	Conformance	The Entity has valid ISO 14001 and ISO 45001 certifications. The Emergency Response Plans are developed and implemented, And the Plans are reviewed every five years, or after any changes to the Business, or changes in the nature or scale of emergency incident risk in accordance with China legal requirements. Personnel training and drill records are maintained. The Emergency Response Plan is publicly available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Business resilience plan that addresses situations for suspending or significantly altering operations due to conflict, pandemics, natural disasters, cyber-attack and other situations. The plan is reviewed at least every five years, including the adequacy of resources.</p> <p>Since the previous Audit, an electrolytic Aluminium production line of the Entity had ceased operation, and corresponding environmental treatment facilities ceased operation. All Hazardous Waste was sent to qualified processors for treatment, and the Baotou Ecological Environment Bureau notified of all activities.</p> <p>Subsequently, the Entity has established a Personnel Placement Plan and all personnel have been reasonably placed and the corresponding welfare benefits have not changed. The interviews during the Audit confirmed that affected Workers were satisfied with the placement results.</p>

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the Mergers and Acquisitions Management Procedure. To date, no mergers or acquisitions have occurred.
2.10a-b Closure, Decommissioning and Divestment	Conformance	No closure, decommissioning or divestment activities are planned in near future. However, should such activities become applicable, the review of environmental, social and governance practices and development of a plan, including consultation as necessary, will be driven by corporate functional teams.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared an annual Sustainability Report that describes its sustainability approach, and summarises their environmental and social impacts, and is available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
3.2 Non-compliance and Liabilities	Conformance	There have been no significant violations by the Entity during the Certification period, as confirmed through reporting on Government-related websites and Non-Governmental Organisation (NGO) websites including: <a href="https://www.creditchina.gov.cn">https://www.creditchina.gov.cn</a> <a href="http://www.gsxt.gov.cn/index.html">http://www.gsxt.gov.cn/index.html</a> <a href="https://www.ipe.org.cn/index.html">https://www.ipe.org.cn/index.html</a>
3.3a-c Payments to Governments	Conformance	The Entity has only made, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in their Annual Financial Audit Report, also with tax payment certificates available.  The Entity has declared its various Payments to Governments are made in accordance with relevant laws and Policies in its Sustainability Report: <a href="http://www.baotou-al.com.cn/xwzx/info/912.htm">http://www.baotou-al.com.cn/xwzx/info/912.htm</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established and implemented a Stakeholder complaints, grievances and requests procedure, which addresses the communication of the Entity's telephone number, email address, and suggestion box and other information to Stakeholders by means of public board, accepting information inquiries, complaints and appeals from all parties. The Entity's Human Resources Department monitors Stakeholders' requests and complaints and has an appropriate resolution mechanism.
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established a Life Cycle Assessment (LCA) management procedure and has developed an LCA for its Aluminium Products. The LCA was conducted as a complete life cycle evaluation for the Entity's Products according to ISO 14044.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed an LCA for its Aluminium Products that focuses on environmental life cycle impacts. LCA studies are available upon customer request.

CRITERION	RATING	COMMENT
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 minimised the generation of Aluminium Process Scrap within its operations and the targets 100% of scrap for collection, recycling and/or re-use. The Entity has a scrap and Dross classification and management procedure to classify and dispose of the different types of Aluminium scrap. Scrap is separated by alloy and sent for recycling. The Entity maintains related records.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed a recycling strategy including specific timelines, activities and targets. The Entity has communicated with various customers how to improve the recycling rate of Products at End of Life. There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity maintains records associated with its recycling contracts with customers for the collection of scrap of Products at End of Life.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has accounted for and publicly disclosed its annual Material Greenhouse Gas (GHG) emissions and energy use by source in its Greenhouse Gas Inventory Report and the Energy, Resources and Raw Material Usage Table, available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>The Entity's GHG emissions data are verified by a Third Party and a written verification statement is available.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as it commenced operation prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Major Non-Conformance	<p>The Entity has established a GHG emissions reduction target for a Mine to Metal Emissions intensity at below 13.0 t CO<sub>2</sub>e/t Al by end 2025, and below 11.0 t CO<sub>2</sub>e/t Al by end 2030.</p> <p>Since the previous ASI Audit however there has been no significant increase in the proportion of new energy power, and as such, the Entity could not provide evidence of a 10% reduction in GHG emission intensity over the previous three years.</p>
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established both short- and medium-term GHG emissions reduction targets, including specific GHG emissions intensity indicators and GHG Emission Reduction Pathways, which address technological transformation to reduce electricity consumption during electrolysis, elimination of backward production lines, procurement of renewable energy, and selection of raw material suppliers with low GHG emissions footprints. The Entity's GHG Emissions Reduction Work Implementation Plan is available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>

CRITERION	RATING	COMMENT
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>The Entity has established both short- and medium-term GHG emissions reduction targets, including specific GHG emissions intensity indicators and emission reduction pathways, which address technological transformation to reduce electricity consumption during electrolysis, elimination of backward production lines, procurement of renewable energy, and selection of raw material suppliers with low GHG emissions footprints. The Entity's GHG Emissions Reduction Work Implementation Plan is available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>The Plan lacks comparative analysis of quantitative indicators and inclusion of a 2050 'end state' target however and its consistency with a 1.5°C warming scenario can therefore not be determined.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has established energy and resource management and carbon emission management procedures, and energy, resource use and GHG emissions are reasonably measured and monitored, and are subject to regular external verification.</p> <p>It was found during the Audit however, that the Entity did not purchase green energy certificates or use new energy electricity as planned.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The pollutants in the Entity's Emissions to Air are quantified in the Environmental Impact Assessment report. Pollutant reduction facilities are in use. Emission levels are monitored monthly, and local legal emission limits are met. The Entity's plans to minimise exposure to, and impacts from, Emissions to Air is available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity's has implemented an Environmental Management System that addresses and manages Discharges to Water. The Entity has established water reduction targets and a plan to minimise adverse impacts. The monitoring results for the major pollutants in wastewater meet the local legal discharge limits. The Entity's plans to minimise exposure to, and impacts from, Discharges to Water is available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted regular Spills and Leakages assessments. No high-risk situations are identified and the Entity has taken preventive action or implemented improvement programs for the potential risks identified. The assessment and management of Spills and Leakages, including the control measures based on spill risk factors, is defined in the Entity's Environmental Management System. Major Spills and Leakages are handled and communicated by the Entity's Emergency Response Team. The assessment and management plan is reviewed at least annually and can be accessed via the following link:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established an Emergency Response Plan and Response Guide that addresses the management of and reporting of Spills. If there is Spill, the Emergency Response Team follows the response. Spill drills are conducted annually to ensure the process is up to date. No spill has occurred in the past few years. The Emergency Response Plan and Response Guide defines the requirement for the Entity to report Spills.</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System, which includes a Waste Management Procedure that defines the processes to collect and dispose of all Waste. The Entity has established continual improvement targets to reduce Waste generation per unit. The targets are reviewed quarterly by the Entity's management team. Annual quantities of Hazardous and Non-Hazardous Waste generated by the Entity and their disposal methods are reported in the Waste Discharge Summary, available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity has constructed a dedicated storage warehouse in accordance with local environmental requirements for Spent Pot Lining (SPL). SPL is sent to a qualified supplier for disposal and no SPL is discharged to marine or aquatic environments.
6.8a-d Dross	Conformance	Dross is stored safely on site. The Entity maintains reporting on Dross and data are documented in the annual Hazardous Waste report. Dross is managed as Hazardous Waste and monitored by the relevant local government department. No Dross is sent to landfill.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has undertaken a water-related risk assessment, including water balance, to determine and map the source and type of water it withdraws and uses. The Entity has a water balance statistical data table for 2022, water resources management goals and plans, and a water balance chart. The water risk assessment considered the Entity's industrial park, nearby lands and waterways risk in their Area of Influence. Due to the nature of the product and production processes, and that most of the Entity's processes include a closed loop water management system, the level of water-related risk was found to be low. The Water Resources Risk Assessment Report is available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined there were no significant water-related risks identified in the Entity's Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has established procedures for the protection of Biodiversity. The Entity is located in an industrial park developed by the local government, and there is no protected flora or wildlife in this area. The Entity has prepared a Biodiversity Assessment Report, which determined there is no significant risk or impact on Biodiversity.
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 did not identify significant risk or impact on Biodiversity or Ecosystem Services.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impact on Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has stipulated relevant requirements for Alien Species in the protection of Biodiversity procedures, including evaluating and controlling risks of Alien Species, which are accidentally introduced by the Entity through operational activities. The Biodiversity risk assessment identified wooden pallets as the only potential source of Alien Species, and all pallets are fumigated before use.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to not explore or develop New Projects in World Heritage Properties in its ASI Performance Assurance Manual. The Entity is located in an industrial park developed by the local government, and is not within a World Heritage Property.
8.6a-d Protected Areas	Conformance	The Entity is located in an industrial park developed by the local government, and there are no Protected Areas in this area. Regardless, the Entity has stipulated relevant requirements and has established a Protected Areas management procedure.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a Social and Environmental Governance Policy, which includes a commitment to respect Human Rights and employees' civil rights, and to eliminate Discrimination. The Policies are reviewed at least every five years, or in response to the annual HSE and social risk assessment. Employees are provided with training on the Policy. The Policy is available on-site and published at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>The Entity has established a Human Rights Due Diligence procedure, conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report, which determined that no adverse Human Rights impacts have been reported since its establishment.</p> <p>The Human Rights Due Diligence process covers the Entity's supply chain.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented a women's protection management procedure that includes protecting women's rights and interests, and has established control measures to ensure that the rights were met. The Entity has implemented a gender equality project implementation plan, which is reviewed annually. The measures to promote gender equity are available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>

CRITERION	RATING	COMMENT
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's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence and Free, Prior and Informed Consent (FPIC) has not been required.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has formulated a cultural and sacred heritage protection management procedure. Based on the Construction Project Environmental Impact Report, the Entity is located in the industrial park developed by the local government, and there is cultural or sacred heritage sites or values.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence and there have been no Resettlements since the Entity joined ASI nor prior. No New Projects or Major Changes have been undertaken since joining ASI that could cause displacement, or require resettlement or land acquisition.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, there is no project causing Displacement in the history of the Entity. This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes undertaken since joining ASI that could cause displacement, or require resettlement or land acquisition.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented an Affected Populations and Organisations management procedure to commit to respect the legal and customary rights and interests of Affected Populations and Organisations in their lands and livelihoods and their use of natural resources, while exploring opportunities to respect and support community livelihoods with the Industrial Economic Zone. There have been no complaints received from Local Communities.</p> <p>The Entity is in close contact with surrounding communities and most Workers are from the local area. The Facility has installed environmental protection devices to reduce potential impacts from air emissions and boundary noise to surrounding communities, which also indicated in the Environmental Impact Assessment (EIA) Report. The Entity supports local charities and participates in community public welfare activities, and has established the Participation in Community Activities Plan, available at:</p> <p><a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>The Plan however lacks communications on the potential impacts of pollutant emissions on the Local Community.</p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a Management System that includes a supply chain Policy, responsibilities and resources, information gathering and supplier engagement. The Entity's Responsible Procurement Policy is available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a risk-based Due Diligence process over their supply chain, which is imbedded in the integrated Management System and the purchasing procedures. The Due Diligence processes did not identify any actual or potential risks in the supply chain.
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-based Due Diligence did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted a risk-based Due Diligence process over their supply chain and the supply chain and suppliers are reviewed annually. The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirements of the Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported on its supply chain Due Diligence in accordance with requirements in its Conflict Minerals Management Measures and supplier sustainability approach. To refer to the strategy documents please refer to: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a>
9.9 Security practice	Conformance	The Entity has implemented a security service management procedure and has defined the primary role of security guards to protect people, property and/or assets, and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Law in China on the right to Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has implemented a Freedom of Association and collective consultation procedure to respect the Workers' right to Freedom of Association and Collective Bargaining. A Labour Union and association for Workers is established in accordance with the legal requirement, and addresses Workers' rights on remuneration, working hours, rest and vacation, safety and health, vocational training, insurance and welfare. The Entity has Collective Bargaining Agreements in place in accordance with the legal requirement.
10.2a-c Child Labour	Conformance	The Entity has implemented a Child Labour Policy. Young Workers receive special protection under the Labour Standards Law and are not allowed to work in hazardous working conditions. The Entity has established processes to verify the age of the candidates through interview and checking ID cards. There is no Child Labour or any young Workers in the Entity, and the youngest Worker on site was 21 years old. The Entity communicates the requirements to the Workers and its

CRITERION	RATING	COMMENT
		suppliers to ensure the legal requirements on Child Labour and young Workers are monitored internally and throughout the supply chain.
10.3a-c Forced Labour	Conformance	<p>The Entity has established and implemented the prevention of involuntary labour procedure, and commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, Slavery and Human Trafficking. Based on Worker interviews, management interview and document review, employees are not required to provide any form of deposit, Recruitment Fee or advances at any stage of the employment. There is no restriction on the Workers' freedom of movement at the site or at on-site accommodation. Workers are free to leave the factory when not engaged in work. There are no foreign Migrant Workers at the Entity. The Entity does not provide any form of loan to Workers. No terms of Debt Bondage were identified in the labour contracts signed between the Entity and Workers, and no illegal deductions identified in the Workers' payslips.</p> <p>The Entity has disclosed a Modern Slavery Statement, available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has implemented an anti-Discrimination, Harassment and abuse procedure that ensures equal opportunities and it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. The Non-Discrimination Policy is included in employee training during onboarding and annual re-calibration. Worker interviews and results of the annual business conduct and conflict assessment confirmed the workplace has equal opportunities and is free of Discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented an employee complaints management procedure. There are regular meetings between the Trade Union and senior management, a grievance and complaints hotline and email, and operating procedures that ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented a corporate Policy that prohibits Harassment and Violence in the workplace. The Entity provides training on the Policy regarding the prevention of Harassment, and countering Harassment and Discrimination. The Entity has established an Ethics and Compliance Integrity Line that available in all languages, and employees can anonymously report any case of Violence or Harassment. The Policy is available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p>
10.7a-d Remuneration	Minor Non-Conformance	<p>The Entity's remuneration payments are documented and promptly paid to all Workers by bank transfer on 20<sup>th</sup> of every month via bank transfer. Employees receive remuneration for working Overtime, on public holidays, on rest days and at night. Payslips with information on wages, calculations and deductions such as taxes, are provided for all employees. Employees are paid wages higher than the fixed living wage in China.</p> <p>Whilst the Entity takes Overtime into account in performance pay, it however cannot demonstrate how much Overtime pay is supplemented.</p>

CRITERION	RATING	COMMENT
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity has implemented an attendance and working hours system. As confirmed by Worker interviews and review of attendance records, working hours are monitored and comply with Chinese Labour Law. Overtime is voluntary, and Workers can refuse to work Overtime. The total weekly hours do not exceed 60.</p> <p>A small sample of Workers' attendance records reviewed during the Audit found however that at least one day off per week is not guaranteed.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has informed Workers of their rights through local information systems including electronic noticeboards, public bulletin boards located in every workshop, the employee manual, training, personal consultations and meetings.</p>

## 11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&amp;S) Management System and has a valid ISO 45001:2018 certificate. The Entity has established formal Policies for OH&amp;S which are posted in the internal public areas.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&amp;S) Management System and has a valid ISO 45001:2018 certificate. The Entity has established OH&amp;S performance indicators, and a comparative analysis of performance with peer Businesses and leading practice is published in the Sustainability Report, available at: <a href="https://www.baotou-al.com.cn/xwzx/info/1522">https://www.baotou-al.com.cn/xwzx/info/1522</a></p> <p>It was identified during the Audit however that there was no warning for high temperature related to the electrolytic carbon slag, and the pumping room associated with the water intake station is not equipped with emergency lights.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established adequate and effective procedures on OH&amp;S control, including Safety Committee meetings, suggestion box, congress and irregular Worker interviews.</p>

### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 December 2023	Initial Certification Audit – Full Certification
1	14 January 2026	Surveillance Audit and Scope Change – Provisional Certification Scope Change to remove Inner Mongolia Huayun New Material Co., Ltd; and to transition to the ASI Performance Standard V3.1

Correction to include the supply chain activity 'Aluminium Re-melting/Refining' in  
the Audit Scope for the Initial Certification Audit

---