

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Guangdong Zhongya Aluminum Co., Ltd.

CERTIFICATE NUMBER

484

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CHINA QUALITY
MARK
CERTIFICATION
GROUP

DATE OF ISSUE

18 DECEMBER 2025

DATE OF EXPIRY

17 DECEMBER 2028

CERTIFIED SINCE

18 DECEMBER 2025

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Manufacture of Aluminium alloy building profiles (base profiles, anodised profiles, electrophoretic painted profiles, powder-coated profiles, painted profiles and insulation profiles) and general industrial Aluminium alloy extruded profiles, as well as related activities involved in the production process of Aluminium alloy doors and windows, and curtain wall components at Guangdong Zhongya Aluminum Co., Ltd. (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Guangdong Zhongya Aluminum Co., Ltd.
ENTITY NAME	Guangdong Zhongya Aluminum Co., Ltd.
CERTIFICATION SCOPE	Manufacture of Aluminium alloy building profiles (base profiles, anodised profiles, electrophoretic painted profiles, powder-coated profiles, painted profiles and insulation profiles) and general industrial Aluminium alloy extruded profiles, as well as related activities involved in the production process of Aluminium alloy doors and windows, and curtain wall components at Guangdong Zhongya Aluminum Co., Ltd. (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">7 – 10 June 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 June 2025
AUDIT SCOPE	<p>The Audit Scope covers the facility of Guangdong Zhongya Aluminium Co., Ltd for the manufacturer of aluminium alloy building profiles and general industrial aluminium alloy extruded profiles, as well as related activities involved in the production process of aluminium alloy doors and windows and curtain wall components.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	19 December 2025 – 18 December 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	18 December 2026
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CERTIFICATE NUMBER	484
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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

Guangdong Zhongya Aluminum Co., Ltd (the 'Entity') was founded in 1993 and is located at 3 East Yalu Street, Zhaoqing High-tech Industrial Development Zone, Guangdong Province, China. It was originally named 'Zhaoqing Xinzhongya Aluminum Co., Ltd.' The factory covers an area of 537,333m², with a total project investment of 80 million US dollars and an annual output of over 200,000 tonnes.

The Entity has a complete production process, including melting and casting, extrusion, anodic oxidation colouring, electro-polishing, electrophoretic painting, fluorocarbon spraying, powder coating, thermal insulation (inserting strips, pouring), deep processing, and fine processing. The workshop is equipped with melting and casting furnaces, Aluminium bar homogenizing furnaces, more than 40 extrusion machines ranging from 500T to 5500T, long billet heating furnaces and hot shears, double traction machines, polishing machines, sandblasting machines and other new equipment.

The products cover architectural decoration Aluminium materials, curtain wall Aluminium materials, industrial Aluminium materials, and special Aluminium profiles with thin walls, wide and flat sections, and super-large cross-sections. It has a new product development centre, a mold manufacturing centre and a testing centre.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	MEDIUM	Medium	MEDIUM	MEDIUM
RISKS	Medium	Medium	MEDIUM	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established the 'Law and Regulation Identification Procedure' and the 'Compliance Evaluation Procedure'. The Administration and Human Resources Department is responsible for evaluating the applicability of Applicable Laws and Compliance.</p> <p>It was identified during the Audit however that the list of Applicable Laws and regulations had not been updated following revision of the <i>Work Safety Law</i> and the <i>Fire Prevention Law</i>.</p>
1.2 Anti-Corruption	Conformance	<p>In accordance with the requirements of the 'Anti-Bribery Management Procedure', the Entity has formulated an anti-Bribery Policy, established an anti-Bribery management team and a risk assessment team. A summary and evaluation of the implementation of anti-Bribery activities is conducted annually.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct in accordance with the requirements of the Environmental, Social and Governance Policy, and conducts regular reviews of the Code of Conduct every year.</p> <p>The Code of Conduct is available at: https://www.zhongya-alum.com/news/752.html</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintained a series of Policies consistent with environmental, social, and governance practices. The Policies are communicated internally and externally and are available at: https://www.zhongya-alum.com/asigongshiziliao/</p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed a senior executive as the ASI Management Representative, responsible for leading and implementing the various Policies formulated by the company and meeting the requirements of the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented an Environmental Management System and obtained an ISO 14001:2015 certificate. The scope of the ISO 14004:2015 certificate aligns with the Entity's ASI Certification Scope.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has implemented a Social Management System and has compiled all the requirements in the 'ASI Management Manual, which addresses Human Rights and Labour Rights.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established the 'Procurement Control Procedure', which is operating effectively on an ongoing basis. It is implemented in accordance with the Entity's ASI Policy, which covers environmental, social and governance aspects.</p> <p>The Entity's ASI Procurement Policy is reviewed at least every five years and following any changes that alter the risks or any indication of a control gap, and is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/02.pdf</p>

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes since the Entity joined ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes since the Entity joined ASI.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented Emergency Response Plans, which include the participation of internal and external Stakeholders. Simulations and emergency drills are conducted at periodic intervals to evaluate the effectiveness of the Plans. The Emergency Response Plan is available at: https://www.zhongya-alum.com/news/262.html
2.8a-d Suspended Operations	Conformance	The Entity has established the 'Business Suspension and Resumption Management Procedure' to address production suspension or transformations due to factors outside its control, taking into account significant adverse environment, society and governance impacts. If any changes occur that alter the nature and scale of environmental, social and governance risks, the procedures for resuming business operations must be reviewed. No such changes have occurred so far.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the 'Merger and Acquisition Procedure', which addresses preparations before implementation, potential risks, and risk avoidance during transactions. When implementing merger and acquisition projects, environmental, social and governance factors are considered. No mergers or acquisitions have occurred since the Entity established the ASI system.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has addressed the relevant requirements for closure, decommissioning and divestment in the ASI Management Manual and the 'Control Procedure for Closure, Decommissioning and Divestment'. To date, the Entity has not experienced any closures, decommissioning or divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has addressed the relevant requirements for sustainability reporting in the ASI Management Manual. The 2025 Sustainability Report is publicly disclosed, available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/09.pdf
3.2 Non-compliance and Liabilities	Conformance	This Entity has defined the requirements regarding violations and responsibilities in the ASI Management Manual. The Entity discloses information on Material fines, judgments, penalties and non-monetary sanctions in its Sustainability Report, which confirmed there were no non-compliance or liabilities, refer page 8: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/09.pdf
3.3a-c Payments to Governments	Conformance	The Entity has established procedures to ensure any payments to Government made by or on its behalf have a solid legal and/or contractual basis. Financial auditing is undertaken as required by Applicable Law and/or directed by the Entity's risk control measures. This has been disclosed in the Sustainability Report, page 5: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/09.pdf

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented Complaints Resolution Mechanisms and procedures, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. The Administrative and Human Resources Department is responsible for tracking the Stakeholder requests and complaints. The Complaint Resolution Mechanism is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/08.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Life Cycle Assessment (LCA) framework to evaluate the environmental impacts of Aluminium production. The LCA report is available for all its production lines and Products. The LCA report has been publicly announced on the company's website.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has prepared the 'Aluminium Life Cycle Environmental Impact Assessment Reports' to provide customers with Life Cycle Assessment information upon request. A 'cradle-to-gate' LCA was carried out by an independent Third Party and in accordance with the ISO standards 14040:2006. The Entity can provide customers with all the necessary data to analyse the carbon footprint of its consumer Products. The LCA Report is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/14.pdf
4.2 Product Design	Conformance	The Entity has stipulated the relevant product design requirements in the ASI Management Manual. The 'Design and Development Control Procedure' has been established, along with the LCA procedure during the product design process.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has clear targets for waste materials generated during the production process. These targets have been distributed to each process and are evaluated monthly. The targets have been largely achieved, as all process waste is 100% re-melted.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has implemented a recycling strategy to recycle process waste and machined Aluminium products, ensure cooperation with qualified Aluminium recycling suppliers and increase the percentage of recycled content for products. The Entity's recycling strategy is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/10.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is involved and engaged in local, regional, and national activities promoting collecting and recycling systems to increase recycling rates. Further information is available in the Sustainability Report: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/10.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has established the ASI Management Manual, which addresses the relevant requirements for disclosing Greenhouse Gas (GHG) emissions and energy usage. Annual GHG emissions data are disclosed in the GHG Emissions Reduction Plan, available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/15.pdf

CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan and Pathway using the ASI method which meets the requirements for controlling global temperature rise to 1.5 degrees Celsius.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Plan and Pathway using the ASI method. The Entity's GHG emissions reduction targets and pathway, including the medium-term goals for five years are reviewed annually. The Entity's GHG Emissions Reduction Plan is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/15.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established relevant procedures to review the GHG Emissions Reduction Plan and assess whether the actual performance of the emission reduction measures has achieved its GHG emission reduction targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The air emission outlets, types of pollutants, and permitted emission concentration limits are quantified in the Entity's pollution discharge permit. Regular monitoring of air emission conditions is conducted as required, and the emissions meet the local legal emission limits. The Entity has implemented the 'Pollutant (Waste Gas) Reduction Plan', which is reviewed annually. Further details are available at: https://www.zhongya-alum.com/asigongshiziliao/ The Entity's Emissions to Air have not however been quantified and disclosed publicly each year.
6.2a-g Discharges to Water	Conformance	The Entity's water pollutants are quantified in its pollution discharge permit. Regular monitoring of the water pollutant emissions is conducted as required, and the emissions comply with the local legal emission limits. The Entity has implemented a 'Pollutant Reduction Plan', which is reviewed annually. The monitoring reports indicate that there have been no cases of emissions exceeding the prescribed limits in the past three years. Further details are available at: https://www.zhongya-alum.com/asigongshiziliao/
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established the 'Emergency Response Plan for Sudden Environmental Incidents' (submitted to the Xin'an Branch of Luoyang Municipal Environmental Protection Bureau in July 2023), and conducts reviews every three years. Potential Spills and Leakages are classified according to the risk level (in the emergency response plan), and different risk types are addressed in accordance with the plan. No Spill or Leakage events have occurred during the evidence collection period.

CRITERION	RATING	COMMENT
		The Entity's Leakage Risk Identification and Management Plan is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/06.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's ASI Management Manual requires the disclosure of any Spill or Leakage incidents. No Spill or Leakage incidents has occurred since the Entity began operation.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has established and implemented an environmental Management System, which including a waste management strategy. The 'Waste Management Procedure' has been established and the quantity of Waste generated and the disposal methods are disclosed annually, available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/30.pdf</p> <p>The quantity and disposal methods of Hazardous Waste and Non-Hazardous Waste have not been disclosed however.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity classifies the Aluminium ash as Hazardous Waste and follows the applicable legal requirements its collection, labelling and storage. No leaks have been observed or reported. The party responsible for the disposal of Aluminium ash has a hazardous waste operation licence and adhere to the regulations. The supplier visit report confirmed that Aluminium residues are not sent to landfill.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	"The water supply system originates from the industrial park's water supply network. The Entity has assessed its water-related risks and the assessment determined the risk is low, refer to the Water Resources Risk Assessment Report, available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/20.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water-related risks are determined as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Based on the Environmental Impact Assessment Report, the Entity is not located in a Protected Area and does not pose a significant risk to or have an impact on Biodiversity. As a result, it is assessed as having a low risk 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 risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.4 Alien Species	Conformance	The Entity conducts an annual assessment of invasive species and implements control measures for high-risk sources. Currently, no invasive species have been introduced.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is located in the Zhongguancun High-tech Industrial Zone in Guangdong Province, which is not a World Heritage Site. The Entity has made a commitment that it will not conduct exploration or build New Projects in World Heritage Sites.
8.6a-d Protected Areas	Conformance	The Entity is located in the High-tech Industrial Zone in Guangdong Province, which is not classified as a Protected Area. According to relevant Chinese legislation, construction projects must undergo an environmental impact assessment'.
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 committed to respecting Human Rights and has established a Human Rights Policy Commitment Letter which has been disclosed at: https://attachment.pbinfo.cn/file/zhongyuan/pilu_pdf/23.pdf</p> <p>A Human Rights Due Diligence assessment has been conducted, and a gender-responsive Human Rights Due Diligence process is in place. Mapping of Affected Populations and Organisations has been undertaken and a Complaints Resolution Mechanism that addresses Human Rights is also in place.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented a program that promotes gender equity and women's empowerment. The Entity will review the program every five years at least, or when there are any changes to the business, or any indication of a control gap. The Entity has publicly reported on the effectiveness of measures taken to promote gender equality, available at: https://attachment.pbinfo.cn/file/zhongyuan/pilu_pdf/24.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in 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 present in the Entity's Area of Influence and there have been no New Projects or Major Changes at the Entity.

CRITERION	RATING	COMMENT
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 identified in the Entity's Areas of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as it located within the industrial park planned by the local Government. The Environmental Impact Assessment report confirmed there were no cultural and sacred heritage sites within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as it located at the industrial park planned by the local Government. The Environmental Impact Assessment report confirmed there were no cultural and sacred heritage sites within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI. The Entity has not relocated communities historically and does not plan for any relocation in the future.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented a 'Stakeholder Management Procedure', respecting the legal and traditional rights of the Local Community regarding their land, livelihoods and use of natural resources. The Entity has defined documented policies and procedures to identify and assess the legal and customary rights of Local Communities. No negative feedback has been received and the risk of impact to residents is limited.
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, assigned responsibilities and resources, information gathering and supplier engagement activities. The Entity's Responsible Procurement Policy is available at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/02.pdf
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity systematically collects critical data from potential suppliers through a comprehensive questionnaire during the onboarding process consisting of key information such as a continuous improvement commitment, company code of ethics, compliance with ISO 9001, ISO 14001, the ASI Performance Standard, industrial emissions licences, and the supplier's sustainability performance. The Entity's suppliers are not located in Conflict-Affected and High-Risk Areas (CAHRAs)
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as it has reviewed supplier information and as all suppliers are located within China where there are no CAHRAs and the risk in the supply chain is low.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity conducts annual audits of its ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certified Management Systems. It also reviews the implementation of its procurement control procedures to evaluate their suitability and effectiveness.

CRITERION	RATING	COMMENT
		The Entity's Due Diligence processes were included in this ASI Audit, which addresses this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established a sourcing management procedure, which includes managing CAHRAs. It conducts Due Diligence on its Suppliers and reports on supply chain Due Diligence annually. The Entity sources all materials domestically and is not affected by CAHRAs. Further information is available in the 2025 Sustainability Report, page 6: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/09.pdf
9.9 Security practice	Conformance	The Entity has formulated and implemented the 'Security Management Regulations', which clearly define the management responsibilities of security personnel and to provide training to ensure that all security personnel understand their tasks and respect Human Rights. No complaints or accusations regarding security practices have been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	<p>This Criterion is not applicable to the Entity, as it complies with Applicable Law related to Freedom of Association and Collective Bargaining in China.</p> <p>The Entity has formulated the 'Management Procedure for Freedom of Association and Collective Bargaining Rights', which stipulates that all employees have the right to establish, join or organise Trade Unions freely, and to represent themselves and participate in Collective Bargaining.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>The Entity has established a Trade Union organisation in accordance with Chinese laws and Workers freely choose their own Worker representatives.</p> <p>The Entity is obligated to assist each department in electing its employee representatives when necessary. These representatives are responsible for supervising and reporting issues related to Health and Safety, welfare, and the social Management System to management.</p>
10.2a-c Child Labour	Conformance	The Entity has established and implemented the 'Child Labor and Minors' Labor Management Procedure', prohibiting the use of Child Labour and eliminating the employment of Child Labour and minors. The Entity does not employ any Worker under the age of 18 years.
10.3a-c Forced Labour	Conformance	<p>The Entity has established and implemented the 'Forced Labor Management Procedure', with a commitment to not use or support Forced Labour or Human Trafficking. They do not require any form of deposit, Recruitment Fee, costs and charges or equipment advance from Workers either directly or through employment or recruitment agencies.</p> <p>The Entity has disclosed a Modern Slavery Statement: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/25.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity has developed Policies on non-Discrimination and equal opportunity and a commitment to diversity to ensure that all Workers can work in an environment free from unlawful Harassment,

CRITERION	RATING	COMMENT
		Discrimination and retaliation. This information is publicly disclosed at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/25.pdf
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, through meetings and established policies and procedures.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Policy to eliminate Violence and Harassment in the workplace. An information brochure has been developed and distributed to all employees. The Elimination of Violence and Harassment Policy is disclosed at: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/26.pdf
10.7a-c Remuneration	Conformance	The Entity ensures that wages and benefits are paid in accordance with all Applicable Laws. Wages and benefits are paid in a manner convenient for the employees. All Overtime is compensated with Overtime allowances in accordance with national regulations regarding labour law.
10.8a-c Working Time	Conformance	The working hours of actual employees comply with national laws and regulations as well as labour contracts. There are a few cases of overtime work, which are all voluntary actions by the employees. Employees must have at least one day off for every six consecutive working days.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its employees of their rights through documentation regarding their rights. The Entity fulfills the obligation of informing employees of their rights through staff representative meetings and via trade unions. Employees can also learn about their rights and obligations through other means, such as letters, emails, phone calls, and face-to-face meetings.
11. OCCUPATIONAL HEALTH AND SAFE		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System and has obtained ISO 45001:2018 certification. On-site observations, documentation review, and interviews with employees confirmed that the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity regularly reviews its OH&S Management System through periodic safety meetings, annual compliance evaluations, ISO 45001:2018 internal audits, and management reviews. When there are any changes or indications of control deficiencies, the management system and policies are reviewed. The OH&S goals and indicators for 2024-2025 were all achieved. Information on the effectiveness of the OH&S Management System has been disclosed: https://attachment.pbinfo.cn/file/zhongya-alum/pilu_pdf/27.pdf
11.2 Employee engagement on Health and Safety	Conformance	This Entity has implemented mechanisms such as Trade Unions, environmental and safety committees, and employee representatives to discuss and jointly address OH&S issues. All feedback and

CRITERION	RATING	COMMENT
		suggestions are investigated and analysed, and any necessary action is taken.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 December 2025	Initial Certification Audit – Full Certification