

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Shandong Chuanghui New Material Technology Co., Ltd.

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
520	PERFORMANCE STANDARD (v3.1 2023)	FULL CERTIFICATION	SGS-CSTC STANDARDS TECHNICAL SERVICES
DATE OF ISSUE	DATE OF EXPIRY		CERTIFIED SINCE
9 JANUARY 2026	8 JANUARY 2029		9 JANUARY 2026

#### AUTHORISED BY

A handwritten signature in black ink, appearing to read "ASIA".

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)*

#### CERTIFICATION SCOPE

The production of electrical round Aluminium rods at Shandong Chuanghui New Material Technology Co, Ltd.'s two Facilities in Zouping County, Shandong Province, China. Production processes include refining, Casting, rolling, and winding; the manufacture of overhead stranded wires including drawing, aging testing, and stranding; the production of enamelled round Aluminium wires including drawing, painting, baking, cooling, and coiling.

# AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

MEMBER NAME	Shandong Innovation Group Co, Ltd.
ENTITY NAME	Shandong Chuanghui New Material Technology Co, Ltd.
CERTIFICATION SCOPE	The production of electrical round Aluminium rods at Shandong Chuanghui New Material Technology Co, Ltd.'s two Facilities in Zouping County, Shandong Province, China. Production processes include refining, Casting, rolling, and winding; the manufacture of overhead stranded wires including drawing, aging testing, and stranding; the production of enamelled round Aluminium wires including drawing, painting, baking, cooling, and coiling.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit</li></ul>
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none"><li>• 23 – 24 October 2025</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 18 November 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the Shandong Chuanghui New Material Technology Co, Ltd. production sites located at Qinghe 1st Road (Main park) and Chuangye Avenue (No. 2 Park), both in Weiqiao Town, Zouping City, Shandong Province, and includes the production of electrical round Aluminium rods, Aluminium alloy rods, enamelled wires, Aluminium alloy wires, Aluminium and Aluminium alloy conductors, and other alloy metal materials.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion</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>• Certification</li></ul>

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION PERIOD

9 January 2026 - 8 January 2029

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

9 July 2027

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CERTIFICATE NUMBER

520

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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.

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## ENTITY OVERVIEW

Shandong Chuanghui New Material Technology Co, Ltd. (the 'Entity') was established in June 2004 and is a wholly owned subsidiary of Shandong Innovation Group Co, Ltd. The Entity currently has two production parks: one is located at No. 4188 Qinghe 1st Road, Weiqiao Town, Zouping City, Shandong Province, and the other at No. 1708 Chuangye Avenue, Weiqiao Town, Zouping City, Shandong Province.

The Entity primarily produces Aluminium rods and wires, Aluminium conductors and enamelled Aluminium winding wires. The Entity's approximate annual output of Aluminium rods is 300,000 tonnes, the conductors and Aluminium wires production output is approximately 130,000 tonnes and the enamelled round Aluminium winding wires production output is approximately 10,000 tonnes. The Entity operates seven production lines in its Aluminium workshop, ten drawing production lines in the cable workshop and eight frame twisting production lines. The Entity is one of the largest suppliers of Aluminium rods in China. Production processes include refining, Casting, rolling, and winding. The manufacturing process of overhead stranded wires includes drawing, aging testing and stranding, and the production process of enamelled round Aluminium wires includes drawing, painting, baking, cooling, and coiling. The Entity employs approximately 400 Workers.

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity monitors Applicable Law and regulations, updates their records in a timely manner, implements Compliance assessment procedures for Applicable Law and other requirements, and updates its documentation annually.</p> <p>A review of the Entity's Compliance evaluation record as of July 2025 demonstrated that no substantial fines, judgements, penalties, or non-monetary sanctions were imposed for violation of Applicable Law within the annual reporting period. This was verified by review of the external Credit China report and the Entity's Environment, Sustainability and Governance Report. The site inspection demonstrated that environmental protection controls at the Facilities operate effectively.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has formulated appropriate procedures and regulations regarding anti-Corruption. These procedures and regulations have been strictly implemented, and corresponding evidence has been provided.</p> <p>The implementation status of anti-Corruption measures is publicly disclosed in the Anti-Bribery Policy:  <a href="https://innovationmetal.com/d/file/p/2025/10-27/1730e70e12c89c5796a74679639cf9e7.pdf">https://innovationmetal.com/d/file/p/2025/10-27/1730e70e12c89c5796a74679639cf9e7.pdf</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established and implemented ethical behaviour control procedures and business conduct and ethical standards. The Entity provides training on these procedures and standards, which are evaluated regularly, and implementation is reported on.</p> <p>The Code of Conduct is available at:  <a href="https://innovationmetal.com/d/file/p/2025/10-21/41186e5890a72181c023f2d66eeda9893.pdf">https://innovationmetal.com/d/file/p/2025/10-21/41186e5890a72181c023f2d66eeda9893.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented its ASI Environmental, Social, and Governance (ESG) Policy that has been endorsed by the General Manager, available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/ed65fe4bc276d9ff3b5f70a863d210e1.pdf">https://innovationmetal.com/d/file/p/2025/10-21/ed65fe4bc276d9ff3b5f70a863d210e1.pdf</a></p> <p>The ESG Policy is internally communicated through document distribution and training and is externally communicated to relevant Stakeholders. The Audit confirmed the Policy has been communicated throughout the organisation.</p> <p>The Entity's procedures stipulate that the Policy shall be reviewed annually, or when there is a major change or control deficiency identified.</p>
2.2a-c Leadership	Conformance	The Entity has appointed a Management Representative responsible for implementing Policies and systems required under the ASI Performance Standards and providing the necessary resources for their implementation.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented an Environmental Management System certified to the ISO 14001:2015 standard. The Entity's ISO 14001:2015 Certificate is valid and is available at:</p> <p><a href="https://innovationmetal.com/d/file/p/2025/10-21/dba3071a25f2799ae25bdb9d1fa37cd0.pdf">https://innovationmetal.com/d/file/p/2025/10-21/dba3071a25f2799ae25bdb9d1fa37cd0.pdf</a></p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed a Social Responsibility Management Manual and procedural documents and implemented the Social Management System and accompanying training program for Workers.</p> <p>In accordance with the Entity's procedures, an internal audit was conducted on the implementation of the Social Responsibility Management System, and a review report was documented. The internal audit concluded that the system is appropriate, sufficient, and effective.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has formulated Responsible Procurement Policies and supplier management procedures, which have been implemented alongside relevant training for Workers.</p> <p>The Entity's procedures stipulate that the Policy must be reviewed annually, or when there is a major change or control deficiency identified. The Responsible Procurement Policy is available at:</p> <p><a href="https://innovationmetal.com/d/file/p/2025/10-23/a94b1bd66783d8e3b9b3ab87d5c0abb2.pdf">https://innovationmetal.com/d/file/p/2025/10-23/a94b1bd66783d8e3b9b3ab87d5c0abb2.pdf</a></p>
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 to existing Facilities.
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 to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has identified potential emergency situations and developed Emergency Response Plans accordingly, which are lodged in accordance with local regulations. The Entity has also formulated drill procedures, conducted drills in accordance with the plans, conducted effectiveness evaluations and lodged the drill plans in accordance with local regulations. The Emergency Response Plan is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/e823901794ad10a99bf08535e7991258.pdf">https://innovationmetal.com/d/file/p/2025/10-21/e823901794ad10a99bf08535e7991258.pdf</a></p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established procedures for situations such as suspending operations and resuming production. The Entity has organised training for Workers to implement these procedures.</p> <p>At present, the Entity has not had any suspension of operations scenario. Should such a scenario occur, the Entity will implement its plans, including changes to the production schedule, whilst monitoring Policy changes and communicating with the government to minimise any environmental or social impacts.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established investment/acquisition and merger management control procedures, clarifying the review procedures for environmental, social, and governance issues during the Due

CRITERION	RATING	COMMENT
		Diligence process for mergers and acquisitions. Since joining ASI, the Entity has had no mergers or acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established management measures for enterprise closure, decommissioning, and divestment. There have been no closures, retirements, or divestments at the Entity to date.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed and published an annual Sustainable Development Report, which addresses its relevant environmental, social and governance impacts and performance. The 2024 Sustainable Development Report is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/6f30f2a5eb55a982e4fabaa200b7eebf.pdf">https://innovationmetal.com/d/file/p/2025/10-21/6f30f2a5eb55a982e4fabaa200b7eebf.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has developed compliance and information disclosure management procedures and has provided associated training to its Workers. Currently, there are no Material fines or judgements imposed on the Entity. This was confirmed by a review of the public Credit China report and the results of Government on-site inspection that showed no violations of Applicable Law.
3.3a-c Payments to Governments	Conformance	The Entity pays taxes to the Government in accordance with Applicable Law. The Entity makes no other payments outside of legal requirements. The Entity has disclosed information on payments to governments, available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/18955e038f523eb2f2b28775e8f2b0b5.pdf">https://innovationmetal.com/d/file/p/2025/10-21/18955e038f523eb2f2b28775e8f2b0b5.pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established procedures for managing complaints and appeals from relevant Stakeholders, as well as control procedures for managing complaints from employees.</p> <p>The Complaints Mechanism is legitimate, accessible, predictable, fair, transparent, and Human Rights compatible. Based on participation and dialogue, the Mechanism is sufficient to handle complaints, appeals, and information requests from affected groups and organisations regarding the Entity's operations.</p> <p>The disclosure of the management procedures for complaints and appeals from relevant parties is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/50afebdbba23dc89a62fca22bbeaaad10.pdf">https://innovationmetal.com/d/file/p/2025/10-21/50afebdbba23dc89a62fca22bbeaaad10.pdf</a></p> <p>The Employee Appeal Management Control Procedure is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/ee4d597e15763cfbe8f08d07ec66d41d.pdf">https://innovationmetal.com/d/file/p/2025/10-21/ee4d597e15763cfbe8f08d07ec66d41d.pdf</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has developed Product Life Cycle Assessment (LCA) Reports for its major Product lines.</p> <p>The LCA reports provides 'cradle-to-gate' information on its two major Aluminium Products, covering all production processes and accounting for 95% of the total output of Aluminium Products. The LCA</p>

CRITERION	RATING	COMMENT
		<p>Reports are developed in accordance with ISO 14040:2006 and ISO 14044:2006 Standards.</p> <p>The LCA Report for Electrical Round Aluminium Rod Products is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/cf3aedcd88705000b9591b83a28e0465.pdf">https://innovationmetal.com/d/file/p/2025/10-21/cf3aedcd88705000b9591b83a28e0465.pdf</a></p> <p>The LCA Report for Overhead Stranded Cable Products is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-22/feeb270f03df9daf4edb6e0212dc0e.pdf">https://innovationmetal.com/d/file/p/2025/10-22/feeb270f03df9daf4edb6e0212dc0e.pdf</a></p>
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	<p>The LCA reports provides 'cradle-to-gate' information on its two major Aluminium Products, covering all production processes and accounting for 95% of the total output of Aluminium Products.</p> <p>The LCA Report for Electrical Round Aluminium Rod Products is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/cf3aedcd88705000b9591b83a28e0465.pdf">https://innovationmetal.com/d/file/p/2025/10-21/cf3aedcd88705000b9591b83a28e0465.pdf</a></p> <p>The LCA Report for Overhead Stranded Cable Products is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-22/feeb270f03df9daf4edb6e0212dc0e.pdf">https://innovationmetal.com/d/file/p/2025/10-22/feeb270f03df9daf4edb6e0212dc0e.pdf</a></p>
4.2 Product Design	Conformance	The Entity has developed and implemented the New Product Development Control Procedure, which stipulates environmental requirements for Product design and process engineering. These requirements include considerations for the use of renewable materials, the selection of additives with a low environmental impact; the reduction of waste discharge; the reduction of water consumption; and the optimisation of production processes.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets and relevant management programs to minimise the generation of Aluminium Process Scrap within its own operations. 100% of Process Scrap is collected and separated by alloy types and purification levels.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has implemented a Recycling and Waste Management Strategy to collect and recycle products at End of Life, including timelines, activities and targets. The Entity's performance against its recycling strategy is regularly reviewed. The waste recycling strategy is available at: <a href="https://innovationmetal.com/d/file/p/2025/11-05/12712e151449e9ebe2ebd3b0a9c909f2.pdf">https://innovationmetal.com/d/file/p/2025/11-05/12712e151449e9ebe2ebd3b0a9c909f2.pdf</a>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity undertakes efforts to increase recycling rates in its respective markets for the products containing Aluminium. The Entity has prepared a Scrap Aluminium recycling plan and cooperated with local Scrap Aluminium collection and recycling companies to increase recycling rates.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has accounted for and disclosed its Material process and procurement Greenhouse Gas (GHG) emissions and energy usage data in the Greenhouse Gas Emissions Report available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/9e0e55af3d37f964ff7cdba9bb51ba24.pdf">https://innovationmetal.com/d/file/p/2025/10-21/9e0e55af3d37f964ff7cdba9bb51ba24.pdf</a>

CRITERION	RATING	COMMENT
		The Entity's publicly disclosed GHG emissions data have been independently verified: <a href="https://innovationmetal.com/d/file/p/2025/10-21/257d314bf638fbca238f624bd252f5e5.pdf">https://innovationmetal.com/d/file/p/2025/10-21/257d314bf638fbca238f624bd252f5e5.pdf</a>
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 that includes both Direct and Indirect GHG Emissions, which are Scope 3 Category 1 emissions (from procured Aluminium) as well as Scopes 1 and 2 emissions (process emissions). The GHG Emissions Reduction Pathway is consistent with a 1.5°C warming scenario and was developed using the ASI endorsed methodology with a 2024 baseline year. The GHG Emissions Reduction Plan is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf">https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf</a>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established GHG Emissions Reduction Plan including GHG emissions targets and a GHG Emissions Reduction Pathway. Progress on the Reduction Plan is reviewed annually. The GHG Emissions Reduction Plan is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf">https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf</a></p> <p>The Entity has disclosed its initiatives to reduce GHG emissions at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/1374f57b7944ea084bbbde26cc1d4adc.pdf">https://innovationmetal.com/d/file/p/2025/10-21/1374f57b7944ea084bbbde26cc1d4adc.pdf</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and implemented an Energy Management System for energy conservation and GHG emissions reduction. It has implemented the Greenhouse Gas Emissions Management Manual and Greenhouse Gas Management Control Procedures. The Manual and Procedures defined the requirements for the management of GHG emissions inventories and verification. A GHG Inventory Implementation Committee has been established, and the Entity conducts regular energy monitoring (including natural gas and electricity consumption). The Entity has also prepared a GHG Emissions Reduction Plan including GHG emissions targets and a GHG Emissions Reduction Pathway. The progress on the Reduction Plan is reviewed annually. The GHG Emissions Reduction Plan is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf">https://innovationmetal.com/d/file/p/2025/10-21/9807c35aa0435657e821e3a4529be375.pdf</a></p> <p>The Entity has disclosed its initiatives to reduce GHG emissions at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/1374f57b7944ea084bbbde26cc1d4adc.pdf">https://innovationmetal.com/d/file/p/2025/10-21/1374f57b7944ea084bbbde26cc1d4adc.pdf</a></p>

## 6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Conformance	The Entity's Emissions to Air are controlled through the use of pollution control devices and regular monitoring is undertaken to ensure
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CRITERION	RATING	COMMENT
		Compliance with statutory emission limits. The Air Pollutant Emissions Reduction Plan has been developed and is reviewed annually. There has been no exceedance of emissions limits to date. Air pollutant emissions information is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/b29c4d6ed7645f94220d7b3bfe9cdacd.pdf">https://innovationmetal.com/d/file/p/2025/10-27/b29c4d6ed7645f94220d7b3bfe9cdacd.pdf</a>
6.2a-g Discharges to Water	Conformance	There is no industrial wastewater discharged from the Entity. The only discharges are domestic wastewater. The Entity's Discharges to Water are controlled through the use of water pollutant treatment facilities and regular monitoring is undertaken to ensure compliance with local legal discharge limits. The Water Pollutants Reduction Plan has been developed, implemented and is reviewed annually. There has been no exceedance of emission limits. Information on Discharges to Water is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/b29c4d6ed7645f94220d7b3bfe9cdacd.pdf">https://innovationmetal.com/d/file/p/2025/10-27/b29c4d6ed7645f94220d7b3bfe9cdacd.pdf</a>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has evaluated the risk of Spills and Leakages that may occur during production and operation, and the main potential impacts from such an event to air, water and land. The Entity has established an Emergency Plan to address any Spills and Leakages. The Entity has disclosed the Spill and Leakage Management Plan at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/4ea6b78161a74187ec05e10763bf1caa.pdf">https://innovationmetal.com/d/file/p/2025/10-21/4ea6b78161a74187ec05e10763bf1caa.pdf</a></p> <p>However, the sampling port of a smelting furnace's exhaust stack was not properly sealed, resulting in waste gas leakage.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established a Spill and Leakage management procedure and an emergency plan. The procedure and emergency plan define that the Entity would notify potentially Affected Populations and Organisations as soon as possible after a Spill or Leakage event.</p> <p>The Entity has established a Leakage Management System to assess the risk of Spills and Leakages on an annual basis. The risk assessment has been conducted. The Entity has disclosed the Spill and Leakage Management Plan, available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/4ea6b78161a74187ec05e10763bf1caa.pdf">https://innovationmetal.com/d/file/p/2025/10-21/4ea6b78161a74187ec05e10763bf1caa.pdf</a></p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has developed a Waste Management Procedure and publicly disclosed the amount of Hazardous Waste generated and the relevant waste treatment methods at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/1795471e4f500697087793d22ea4ff92.pdf">https://innovationmetal.com/d/file/p/2025/10-21/1795471e4f500697087793d22ea4ff92.pdf</a></p> <p>The Entity has implemented a Waste Management Strategy, available at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/clae24fb7b1470e8bd622bac623cb106.pdf">https://innovationmetal.com/d/file/p/2025/10-27/clae24fb7b1470e8bd622bac623cb106.pdf</a></p> <p>The Entity has not quantified and publicly disclosed the quantity of Non-Hazardous Waste generated from its activities and associated Waste disposal methods on an annual basis.</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.

CRITERION	RATING	COMMENT
6.8a-d Dross	Conformance	<p>The Entity has facilities for separating Aluminium and Dross from Aluminium slag to improve the use efficiency of Dross. Secondary Aluminium Dross is sent to a dedicated warehouse for storage and labelled accordingly. The Aluminium Dross is legally transferred and disposed by a qualified agency as a dangerous Waste. All Dross slag is reused. No Dross is landfilled.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has disclosed information on its water withdrawals and discharges in the 2024 Sustainable Development Report, page 50: <a href="https://innovationmetal.com/d/file/p/2025/10-21/6f30f2a5eb55a982e4fabaa200b7eebf.pdf">https://innovationmetal.com/d/file/p/2025/10-21/6f30f2a5eb55a982e4fabaa200b7eebf.pdf</a></p> <p>A water resources risk assessment has been completed and documented. The resulting report concludes the Entity's water consumption-related risk is low.</p>
7.2a-e Water Management	Conformance	<p>The Entity has developed its water resources management targets and plan, which includes a water conservation programme for the period 2024–2026. The Water Management Plan has been implemented. The Plan is reviewed annually. The Water Resource Management Targets and Plan are available at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/7a24e7f3928eb4ae799de518b6fc726b.pdf">https://innovationmetal.com/d/file/p/2025/10-27/7a24e7f3928eb4ae799de518b6fc726b.pdf</a></p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has implemented a Biodiversity Protection System based on its Biodiversity Protection Policy. The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The report shows that land use and activities within the Entity's Area of Influence have a low risk of impact on Biodiversity. The Entity's Biodiversity Assessment Report is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/03ee17e95da0200cfa56e091143c83bb.pdf">https://innovationmetal.com/d/file/p/2025/10-21/03ee17e95da0200cfa56e091143c83bb.pdf</a></p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>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.</p>
8.2a-g Biodiversity Management	Not Applicable	<p>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.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified.</p>
8.4 Alien Species	Conformance	<p>The Entity actively prevents the accidental or intentional introduction of Alien Species that could have significant adverse impacts on Biodiversity. No Alien Species have been introduced.</p>

CRITERION	RATING	COMMENT
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity confirmed it is not in proximity to any World Heritage Properties. The Entity is located in a government-designated industrial zone and has made a commitment not to explore or build New Projects in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity confirmed it is not in proximity to any Protected Areas.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a Human Rights impact commitment, including a Human Right Policy to respect Human Rights and a gender-responsive Policy. The Policy is communicated to employees by training. The Entity's Human Rights Policy is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/bfd144600831ab46c1ddbd039c878989.pdf">https://innovationmetal.com/d/file/p/2025/10-21/bfd144600831ab46c1ddbd039c878989.pdf</a></p> <p>The Entity has established a Human Rights Due Diligence Procedure, which defines how to identify any Material impacts to Human Rights in the Entity's own operations and business relationships established through products or services. A Human Rights Due Diligence Report has been prepared, including Due Diligence on internal Human Rights, affected peoples, and suppliers. The Entity reviews the Human Rights Policy every three years. In addition, the Entity has established a Complaints Mechanism accessible to Stakeholders.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a procedure to protect women's rights and promote gender equality. All female Workers are entitled to take paid pregnancy leave, maternity leave and feeding leave. Employees are trained on gender equity. A Grievance and Complaints Mechanism is established.</p> <p>The Entity's gender equity and women's rights program is reviewed annually and in the event of any changes or control deficiencies identified. The Entity has publicly disclosed the Women's Rights Protection Policy at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/dc22b591939f82672063d6fbc4e22676.pdf">https://innovationmetal.com/d/file/p/2025/10-21/dc22b591939f82672063d6fbc4e22676.pdf</a></p> <p>The Entity has disclosed the effectiveness of measures taken to promote gender equality at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/2fb87e6e58cfe505436bf8a9b1529d57.pdf">https://innovationmetal.com/d/file/p/2025/10-27/2fb87e6e58cfe505436bf8a9b1529d57.pdf</a></p> <p>The Entity has disclosed the performance of its gender equity program such as how many women it employs and whether they hold senior roles. This information is available in the 2024 Sustainable Development Report on pages 46-47: <a href="https://innovationmetal.com/d/file/p/2025/10-27/7c58a89f50fdd3dd53bd67c2990c84ec.pdf">https://innovationmetal.com/d/file/p/2025/10-27/7c58a89f50fdd3dd53bd67c2990c84ec.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as no Indigenous Peoples are identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region.

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as no Indigenous Peoples are identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region.
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 no Indigenous Peoples were identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity's Environmental Impact Assessment confirmed that the Entity is located in the dedicated industrial zone, with no cultural or sacred heritage sites or values 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 no cultural and sacred heritage locations are present within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity does not have projects that require relocation or transfer. No resettlements have been necessary, as no local residents are affected by the sites.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has identified potentially Affected Populations and Organisations. The Entity assessed the impacts of its operations on affected groups in areas such as health and safety, social and cultural Human Rights, and the environment. It has developed a Community Engagement Plan outlining projects, resources, and implementation methods for community engagement.</p> <p>This Community Engagement Plan is updated every three years and is disclosed at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/a344457632be881a96bd2316d0d79cca.pdf">https://innovationmetal.com/d/file/p/2025/10-27/a344457632be881a96bd2316d0d79cca.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies and procedures to implement best integrity practices. The Entity has exercised risk-based Due Diligence over the Aluminium sourced for its Products. The Entity's supplier must sign the 'No Use of Conflict Minerals Commitment' letter.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies and procedures. The Entity has exercised risk-based Due Diligence over the Aluminium sourced for its Products. The Due Diligence results demonstrated that there is no Aluminium sourced from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	Through the Entity's internal risk-based Due Diligence, it has been demonstrated that no materials have been sourced from CAHRAs. However, a strategy has been established to respond to risks, if they are identified in future.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted Due Diligence monitoring on its Aluminium supply chain. This ASI Audit provides an independent Third Party audit of the Entity's Due Diligence practices, which meets the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity does not contribute to armed conflict or Human Rights abuses in CAHRAs. The Entity's Annual Report on Supply Chain Due Diligence is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-27/ce960646dce9a230c6614449fa1f96fb.pdf">https://innovationmetal.com/d/file/p/2025/10-27/ce960646dce9a230c6614449fa1f96fb.pdf</a>
9.9 Security practice	Conformance	The Entity has implemented a security practice that addresses Human Rights. The security guards are trained on rights and responsibilities in terms of respecting internal and external Stakeholders, including Workers.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>The Entity has established procedures for managing Freedom of Association and Collective Bargaining rights, as well as for managing and controlling the formation and election of Trade Unions and strictly implements them. There are no other association organisations except for Trade Unions, and employees have the right to join or leave Trade Unions.</p> <p>Interviews with employees verified that the decision to join the employee committee is entirely made by the Workers. The right to Collective Bargaining is respected by the Entity.</p>
10.2a-c Child Labour	Conformance	<p>The Entity has a Policy prohibiting the use of Child Labour, and there are no children or underage Workers at the Facilities. The minimum age for Workers is 18 years of age.</p> <p>China prohibits the use of Child Labour, and underage Workers (aged 16 to 18) are specially protected by law and are not allowed to work in hazardous working conditions.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity explicitly prohibits the use of Forced Labour. The Entity has not directly or through any employment or recruitment agency participated in or supported Human Trafficking.</p> <p>Based on interviews with employees and document review, it was found that all Workers have signed labour contracts. According to Worker interviews and document review, there is no illegal deduction of wages, Debt Bondage, debt repayment, or any other indication of Forced Labour at the Entity.</p> <p>The Entity has issued its annual Declaration on Modern Slavery at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/918df0b5789f23a946b872af8bf2eb7.pdf">https://innovationmetal.com/d/file/p/2025/10-21/918df0b5789f23a946b872af8bf2eb7.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity has established anti-Discrimination management control procedures to ensure equal opportunities and not discriminate or support Discrimination or any other circumstances that may lead to

CRITERION	RATING	COMMENT
		Discrimination in the recruitment, salary, promotion, training, promotion opportunities or dismissal of any Worker, in accordance with International Labour Organization conventions C100 and C111. The Entity is committed to non-Discrimination. No Discrimination cases have been received.
10.5 Communication and engagement	Conformance	The Entity engages in direct and frequent communication with Workers and Worker representatives regarding the resolution of working conditions, workplace and compensation issues, without the threat of retaliation, intimidation, Violence or Harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has formulated a Social Responsibility Commitment Letter and established a Complaints and Grievances Handling Mechanism in case of Violence and Harassment. The Entity respects employees, only conducts disciplinary actions in compliance with legal provisions, and implements Human Rights Policies, prohibiting Violence and inhumane treatment of employees.</p> <p>According to Worker interviews, there are no incidents of Violence and Harassment within the Entity.</p> <p>The Entity's Anti-Violence and Harassment Program is available at: <a href="https://innovationmetal.com/d/file/p/2025/10-21/bc1b6b1bfa6916ff8bff6df692c8b417.pdf">https://innovationmetal.com/d/file/p/2025/10-21/bc1b6b1bfa6916ff8bff6df692c8b417.pdf</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity's salary structure is clear, and the monthly comprehensive salary standard provided by the Entity meets the local minimum wage requirements. The Entity has purchased five social insurances and one housing fund for all employees. The total salary meets the basic needs of Workers. All Workers are enrolled in the mandatory social insurance plan.</p> <p>The Entity has established a salary management control program that processes monthly payment of wages in legal currency with complete records. The Audit examined samples of transfer records from the Entity's bank.</p>
10.8a-c Working Time	Conformance	The Entity has clearly defined the working hour requirements for employees. According to employee interviews and a review of employee attendance records, the workshop implements a three-shift system with one day off per week, whilst management personnel work six days a week followed by one day off, they do not work continuously for seven days. Currently, based on the preceding six-month period, the Workers have not had workdays exceeding eight hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity has developed Policies such as employee manuals, employment management procedures and Human Rights guidelines, and has informed employees of their Freedom of Association and Collective Bargaining rights through training, regular meetings and other means.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System and obtained ISO 45001:2018 certification, and the certificate status is valid.

CRITERION	RATING	COMMENT
		The Audit identified there is no secondary containment for chemicals stored in the warehouse in the Entity's 'No. 2 Industrial Park' Facility.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's procedures stipulate that the OH&amp;S Management System must be reviewed at least once a year or when there are any changes that result in substantial changes in OH&amp;S risks or when there are signs of control gaps. The Entity's current practice is to undergo both an external audit and an internal audit once a year.</p> <p>The Entity analyses the effectiveness of the OH&amp;S Management System annually, and publish its performance including leading and lagging indicators and an industry comparison at:</p> <p><a href="https://innovationmetal.com/d/file/p/2025/10-21/f7057b1f81d78b19e42851134aa0690e.pdf">https://innovationmetal.com/d/file/p/2025/10-21/f7057b1f81d78b19e42851134aa0690e.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a safety committee with representatives including frontline employees, who participate in hazard identification and accident handling.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 January 2026	Initial Certification Audit – Full Certification