

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TIANJIN XMXYG ALUMINIUM CO., LTD.

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
505	PERFORMANCE STANDARD (v3.1 2023)	FULL CERTIFICATION	BUREAU VERITAS CERTIFICATION
DATE OF ISSUE	20 DECEMBER 2025	DATE OF EXPIRY	CERTIFIED SINCE
			20 DECEMBER 2025

AUTHORISED BY

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

CERTIFICATION SCOPE

Production of Aluminium and Aluminium alloy casting ingot, sheet and strip products at the TIANJIN XMXYG ALUMINIUM CO, LTD. facility in Wuqing District, Tianjin, 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

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	TIANJIN XMXYG ALUMINIUM CO., LTD.
ENTITY NAME	TIANJIN XMXYG ALUMINIUM CO., LTD.
CERTIFICATION SCOPE	Production of Aluminium and Aluminium alloy casting ingot, sheet and strip products at the TIANJIN XMXYG ALUMINIUM CO., LTD. facility in Wuqing District, Tianjin, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">28 July – 31 July 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">25 September 2025
AUDIT SCOPE	<p>The Audit Scope included the production of Aluminium and Aluminium alloy casting ingot, sheet and strip products at TIANJIN XMXYG ALUMINIUM CO., LTD. facility in Wuqing District, Tianjin, China.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 20 December 2025 – 19 December 2028

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 19 December 2026

CERTIFICATE NUMBER 505



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

Tianjin Xiangyu Aluminium Co, Ltd, known as TIANJIN XMXYG ALUMINIUM CO, LTD. (the 'Entity') is located in Wuqing District, Tianjin, China and covers an area of 6 square kilometres. The Entity was formally known as Tianjin Zhongwang Aluminium Co, Ltd.

The Entity mainly engages in the research and development, production and sale of Aluminium rolled products, including Aluminium alloy sheet and strip materials. It possesses a complete industrial chain for the production and manufacturing of its Aluminium products with multiple production processes including melting and casting, hot rolling, cold rolling and deep processing. The Entity's products are widely used in aerospace, shipping, automobiles, rail transit, packaging, chemical engineering, construction machinery, molds, urban construction and other fields. In 2024, the total output of the Entity's products was 522,064 tonnes, including 455,987 tonnes of coils and 66,077 tonnes of plates.

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 a Laws and Regulations Control Procedure, and it complies with national and international laws. It maintains a list of Applicable Law and has detailed descriptions for the conduct of internal audits. The Entity's EHS Department, QA Department and Administration Department are responsible for the assessment of Compliance with Applicable Law, which occurs at least annually.</p> <p>The list of Hazardous Wastes however is outdated and does not reflect the 2025 version. Also, regulations on the protection of historical and architectural features in Tianjin are not addressed.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity has established a management procedure on anti-Corruption and anti-Bribery. The Entity has established an anti-Bribery management team, who undertake regular assessments. A Bribery risk assessment level standard has been established, and employees have been regularly trained. The Entity evaluates the implementation of its anti-Bribery activities annually to determine whether measures are suitable and to revise the Entity's Bribery risk status.</p> <p>The Entity did not provide comprehensive evidence during the Audit however on their identification and assessment of Corruption risks, such as those related to the Business Department, Quality Management Department, and management activities.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct, which addresses environmental, social and governance principles. The Entity conducts annual internal audits and management review of the Code of Conduct. The Code is revised on any change in law and business trends. Staff awareness of the Code is raised through various measures, including meetings and training.</p> <p>The Code of Conduct is available at:</p> <p>http://www.xiangyu-aluminium.com/report.html</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has established an ASI Management Policy that addresses environmental, social, and governance aspects, which is approved by the General Manager and publicly available at:</p> <p>http://www.xiangyu-aluminium.com/report.html</p> <p>The Policy however has not been clearly communicated to all internal employees.</p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed a senior Management Representative, and this role has overall responsibility and authority for ensuring conformance with the ASI Performance Standard, the implementation and communication of relevant Policies and providing the necessary resources to establish, implement, maintain and improve the Management Systems required throughout the ASI Performance Standard.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 and ISO 45001:2018 certificate.
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 undertaken annually to ensure its effectiveness.
2.4a-e Responsible Sourcing	Conformance	<p>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.</p> <p>The Policy is included in the ASI Management Policy, available at: http://www.xiangyu-aluminium.com/report.html</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since it became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001 and ISO 45001 certificates. Emergency Response Plans (ERPs) are developed and implemented. There are processes in place to ensure the ERPs are reviewed every five years, or after any changes to the Business that alters the risks, and in accordance with legal requirements. Personnel training and drill records were verified during the Audit.</p> <p>The Emergency Response Plan is publicly available on the website: http://www.xiangyu-aluminium.com/environmental-protection.html</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Management Procedure to address cases of a suspension or significant alteration in operations due to conflict; pandemics; natural disasters; cyber-attack and other situations. This plan was successfully implemented during the COVID-19 pandemic conditions and demonstrated the readiness of the Entity to respond and the adequacy of its resources.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the Mergers and Acquisitions Management Procedure. To date, no mergers and acquisitions have occurred.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning or divestment activities are not planned in near future. When applicable, activities around closure, decommissioning and divestment will be driven by Corporate functional teams to conduct a review of environmental, social and governance consequences and consult, where possible, with the participation of Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity has published an annual Sustainability Report that describes their sustainability approach and summarises environmental and social impacts, available at:</p> <p>http://www.xiangyu-aluminium.com/esg_report.html</p> <p>The quality and level of detail provided in the Entity's 2024 Sustainability Report however is not adequate and quantitative data not included.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>No non-compliance or liabilities were reported in the Entity's Sustainability Report or recorded on the relevant non-governmental organisation (NGO)-related websites or the government website, available at: https://www.gsxt.gov.cn</p> <p>A work safety accident at the facility in January 2024 resulted in a fine. However, the accident occurred under the former Tianjin Zhongwang Aluminum Industry Co, Ltd and prior to the transfer of the operations to the investor group Xiamen Xiangyu Group Co, Ltd, the Entity's parent company.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in the Annual Financial Audit Report, also with tax payment certificates available. The tax, financial or in-kind political contributions made information can be addressed in page 10 of the Sustainability Report via the link below:</p> <p>http://www.xiangyu-aluminium.com/esg_report.html</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>This Entity has established and implemented a Stakeholder Complaints, Grievances and Requests Procedure, which addresses the publication of the Entity's contact telephone number and email address, and provision of a suggestion box and other information to Stakeholders by means of public notices and accepting information inquiries, complaints and appeals from all parties.</p> <p>The engagement and dialogue for the grievances procedure however is not satisfactory.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has established a Life Cycle Assessment (LCA) Management Procedure and has developed an LCA for its Aluminium Products.</p> <p>The data used in the LCA reports however has not been verified by a Third Party.</p>

CRITERION	RATING	COMMENT
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. The LCA studies are available upon customer request.
4.2 Product Design	Conformance	The Entity has integrated relevant objectives into the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its operations and targets 100% of Scrap for collection, recycling and/or re-use.
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	Minor Non-Conformance	<p>There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity's Aluminium production waste is entrusted to a local company for remelting and recycling. The Entity is working with the customer to decide how to improve the recycling rate of Products at End of Life. Recycling contracts with customers to collect Products at End of Life and related recycling records are kept.</p> <p>The Entity has established an Aluminium Scrap recycling strategy for 2025 to 2030 and announced it on its official website. The recycling ratio in the strategy however does not clearly specify the recycling indicators pre and post consumption.</p>

5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has accounted for and publicly disclosed its annual Material Greenhouse Gas (GHG) emissions and energy use by source in its GHG Verification Report, available at:</p> <p>http://www.xiangyu-aluminium.com/report.html</p> <p>The carbon footprint data of 'green' Aluminium in the disclosed GHG report however is calculated based on the converted production output corresponding to the purchase of 'green' electricity by the electrolytic Aluminium plant, rather than by integrating all power sources. Although there is a Third-Party verification statement, it is inconsistent with the accounting method required by ASI.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan that includes GHG Emission Reduction Pathways and both short- and medium-term GHG emissions reduction targets, including specific GHG emissions intensity indicators. The Plan address technological transformation to reduce electricity consumption during electrolysis, elimination of backward production lines, procurement of renewable energy and the selection of raw material suppliers with low GHG emissions footprints.</p> <p>The Entity's GHG Emissions Reduction Plan however does not disclose detailed emissions reduction measures and sufficient data to confirm that emission reduction actions can be achieved.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan that includes GHG Emission Reduction Pathways and both short- and medium-term GHG emissions reduction targets, including specific GHG emissions intensity indicators.</p> <p>The Entity's GHG Emissions Reduction Targets and Plan is available at: http://www.xiangyu-aluminium.com/report.html</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established energy and resource management and carbon emissions management procedures, and the energy and resource use and GHG emissions are reasonably measured and monitored and subject to regular external verification.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's air emission pollutants are quantified in the Environmental Impact Assessment report. Pollution control facilities are used and air emissions, which are monitored regularly meet the local legal emission limit.</p> <p>The plan to minimise exposure to and impacts of Emissions to Air is detailed in the Sustainability Report, available at: http://www.xiangyu-aluminium.com/esg_report.html</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are managed within the Environmental Management System. The Entity has established water reduction targets and a related plan to minimise adverse impacts. Relevant pollutants are monitored and results indicate pollutant discharges meet the local legal discharge limit.</p> <p>The plan to minimise exposure to and impacts of Discharges to Water is detailed in the Sustainability Report, available at: http://www.xiangyu-aluminium.com/esg_report.html</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity conducts 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 for Spills and Leakages is addressed within the Environmental Management System. Major Spills and Leakages are handled and communicated by the Emergency Response Team.</p> <p>The Spills and Leakages Management Plan is reviewed at least annually and is available at: http://www.xiangyu-aluminium.com/environmental-protection.html</p>

CRITERION	RATING	COMMENT
		Observations during the Audit however found that some leakage risks were not identified.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established an Emergency Response Plan that addresses the management and reporting of Spills. No spill has occurred in the past few years. The Emergency Response Plan defines the requirements for the Entity to report Spills and Leakages.</p> <p>The Spills and Leakages Management Plan is available at: http://www.xiangyu-aluminium.com/environmental-protection.html</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>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. The targets are reviewed quarterly by the management team. The annual quantity of Hazardous and Non-Hazardous Waste and their disposal methods are detailed in the Hazardous Waste Use and Discharge Record, General Waste Use and Discharge Record and the Pollutant Emission Information, available at (files number 5, 6 and 8):</p> <p>http://www.xiangyu-aluminium.com/environmental-protection.html</p> <p>The hazardous characteristics indicated on the hazardous waste label however do not match the actual characteristics of the Hazardous Waste. For instance, oily sludge is not classified as a flammable liquid however it is labelled as such.</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	Aluminium Dross is managed as a Hazardous Waste, is stored in a designated warehouse and transfer records management is undertaken throughout the process. The Entity's Hazardous Waste ledger and transfer records of Aluminium Dross residue are maintained. No Dross is sent to landfill.

7. WATER STEWARDSHIP

7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has undertaken a water-related risk analysis, including water balance, to determine and map the source and type of water it draws and uses. The Entity has a water balance statistical data table for 2024, water resources management goals and plans, and a water balance chart. The Entity has conducted a water risk assessment, which considered the Entity's industrial park location, nearby lands and waterways in their Area of Influence, and the level of water-related risk was determined as low.</p> <p>The Water Resources Risk Assessment is available at: http://www.xiangyu-aluminium.com/environmental-protection.html</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risk assessment identified the risks as low.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
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. A Biodiversity risk assessment has been conducted that determined that there is no significant risk of 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 assessment on the risk to and potential impacts on Biodiversity and Ecosystem Services determined the risk as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the assessment on the risk to and potential impacts on Biodiversity and Ecosystem Services determined the risk as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the assessment on the risk to and potential impacts on Biodiversity and Ecosystem Services determined the risk as low.
8.4 Alien Species	Conformance	The Entity has established procedures for the protection of Biodiversity and relevant requirements for Alien Species in the ASI Performance Assurance Manual, including for the evaluation and control of risks of Alien Species accidentally introduced by the Entity through operational activities.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has established a commitment to "No Go" in World Heritage Properties in the ASI Performance Assurance Manual, including to not explore or develop New Projects in World Heritage Properties. The Entity is located in an industrial park and there are no World Heritage Properties in this area.
8.6a-d Protected Areas	Conformance	The Entity has established relevant requirements for Protected Areas in the ASI Performance Assurance Manual. The Entity is located in an industrial park and there are no Protected Areas in this area.
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 included in the ASI Management Policy, available at:</p> <p>http://www.xiangyu-aluminium.com/report.html</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</p>

CRITERION	RATING	COMMENT
		Rights impacts have been reported since its establishment. The Human Rights Due Diligence process covers the Entity's supply chain.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a management procedure on women's protection that includes protecting women's rights and interests and has established control measures to ensure that rights are met. The Entity has implemented a gender equality project implementation plan, which is reviewed annually. The measures to promote gender equity are included in the Sustainability Report, available at: http://www.xiangyu-aluminium.com/esg_report.html
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an area with no presence of Indigenous Peoples.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an area with no presence of Indigenous Peoples. No New Project or Major Changes have occurred since the Entity joined ASI.
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 it is located in an area with no presence of Indigenous Peoples.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has established a procedure on cultural and sacred heritage protection. Based on the Construction Project Environmental Impact Report, the Entity is located in the industrial park developed by the local government, and there are no 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 it is located in an area with no presence of Indigenous Peoples or cultural heritage sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI and no displacement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a procedure on Affected Populations and Organisations with a commitment to respecting 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 has developed a Community Management and Implementation Plan, available at: http://www.xiangyu-aluminium.com/report.html</p>
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

CRITERION	RATING	COMMENT
		Procurement Policy is included in the ASI Management Policy, available at: http://www.xiangyu-aluminium.com/report.html
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 issued in the integrated Management System and in 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	Conformance	The Entity has conducted a risk-based Due Diligence process over their supply chain, which is issued in the integrated Management System and in the purchasing procedures. The Due Diligence processes did not identify any actual or potential risks in the supply chain.
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 fully meets the requirements of this 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. The Supply Chain Due Diligence Report is available at: http://www.xiangyu-aluminium.com/report.html
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.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Criterion is not applicable to the Entity, as it adheres to Applicable Law in China regarding Freedom of Association and Right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has implemented the Freedom of Association and Collective Consultation Procedure to respect the Freedom of Association and right to Collective Bargaining. The Entity commits itself to respect Workers' rights. The Labour Union and association for Workers were established in accordance with the legal requirement, and act on behalf of Workers regarding issues related to remuneration, working hours, rest and vacation, Health and Safety, vocational training, insurance and welfare. Whilst there are no Collective Bargaining Agreements at the Entity, it respects the rights of Workers to Collectively Bargain.
10.2a-c Child Labour	Conformance	The Entity has implemented a Policy on the prohibition of Child Labour. Young Workers are under special protection by Labour Standards Law and not allowed to work in hazardous working conditions. The age of

CRITERION	RATING	COMMENT
		<p>candidates is verified by checking the ID cards and during interview. The youngest Worker at the Entity was 20 years old.</p> <p>The Entity communicates the requirement to the Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.</p>
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.</p> <p>Worker interviews, including on-site accommodation Workers, management interviews and document review confirmed that employees are not required to provide any form of deposit, recruitment fee or payment advance at any stage of employment. There is no restriction of the Workers' freedom of movement at the site or on-site accommodation, And Workers are free to leave the factory when not engaged in work.</p> <p>There are no foreign Migrant Workers at the Entity.</p> <p>The Entity has disclosed a Modern Slavery Statement, available at: http://www.xiangyu-aluminium.com/pdf/asi/%E7%8E%B0%E4%BB%A3%E5%A5%B4%E9%9A%B6%E5%88%B6%E5%A3%B0%E6%98%8E.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established an Anti-Discrimination, Harassment and Abuse Procedure that effectively ensures equal opportunities, and it does not engage in, or support, Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. Training on the non-Discrimination Policy is provided during employee on-boarding and annual re-calibration. Worker interviews and the results of the annual business conduct and conflict review indicated that an environment of equal opportunity and non-Discrimination is in place.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established and implemented an Employee Complaints Management Procedure. There are regular meetings between the Trade Union and senior management, a grievance and complaint hotline and email contact, and operating procedures to 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 and maintains a corporate Policy to prevent Harassment in the workplace, which excludes any kind of Harassment and Violence in the workplace, and training is provided on aspects of this Policy concerning the prevention of Harassment and countering Harassment and Discrimination.</p> <p>The Ethics and Compliance Integrity Line is available in all languages where employees can anonymously report any cases of Violence or Harassment.</p> <p>The Policies are included the ASI Management Policy, available at: http://www.xiangyu-aluminium.com/report.html</p>

CRITERION	RATING	COMMENT
10.7a-c Remuneration	Conformance	All payments are documented and promptly paid to all Workers by bank transfer on 10 th day of the following month by bank transfer. Employees receive additional remuneration for working Overtime, on public holidays and rest days and at night. Employees receive a monthly pay slip that includes information on the wage, its calculation method and deductions such as taxes. All employees are paid wages higher than the living wage fixed in China.
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity has implemented an attendance and working hours system and Working Time is recorded and managed. Based on Worker interviews and document review, the total weekly hours do not exceed 60, and at least one day of rest in a week is guaranteed.</p> <p>Based on a review of the Voluntary Overtime Management Procedure and confirmation from Workers, Overtime is voluntary, and Workers can refuse to undertake Overtime hours.</p> <p>However, the Audit identified that the monthly Overtime hours for some selected Workers exceeded 36 hours, which is not consist with the China Labour Law.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through local information systems including the Employee Handbook, electronic boards, public bulletin boards located in every workshop, trainings, personal consultations and during meetings.
11. OCCUPATIONAL HEALTH AND SAFE		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System and has a valid ISO 45001:2018 certificate. The Entity has established formal Policies for OH&S which are posted in the internal public areas.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented an OH&S Management System and has a valid ISO 45001:2018 certificate. The Entity has established performance indicators, and a comparative analysis of performance with peer Businesses and leading practice is published in the Sustainability Report, available at:</p> <p>http://www.xiangyu-aluminium.com/esg_report.html</p> <p>The Audit however found that there are no corresponding signs posted at the evacuation assembly points in the dormitory area. Also, the pedestrian overpass in the visiting passage in the factory area is not marked with the load-bearing capacity nor the number of visitors.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established adequate and effective procedures on OH&S control, including Safety Committee meetings, a suggestion box, congress and irregular Worker interviews.

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	20 December 2025	Initial Certification Audit - Full Certification
