

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CHINALCO-SWA Co., Ltd.

CERTIFICATE NUMBER
346

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
8 MARCH 2024

DATE OF EXPIRY
7 MARCH 2027

CERTIFIED SINCE
8 MARCH 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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

CERTIFICATION SCOPE

Manufacturing of Aluminium plates
and strips at the CHINALCO-SWA
Co., Ltd. production plant (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	CHINALCO-SWA CO., Ltd.
ENTITY NAME	CHINALCO-SWA Co, Ltd.
CERTIFICATION SCOPE	Manufacturing of Aluminium plates and strips at the CHINALCO-SWA Co., Ltd. production plant (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (8 – 11 October 2023)Surveillance Audit (20 – 22 October 2025)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">8 – 11 October 2023 (Initial Certification Audit)20 – 22 October 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2023 (Initial Certification Audit)4 December 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (8 – 11 October 2023)</u></p> <p>The Audit Scope included the manufacturing of Aluminium plates and strips at the CHINALCO-SWA Co, Ltd. production plant (China).</p> <p>Supply Chain Activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (20 – 22 October 2025)</u></p> <p>The Audit Scope included the manufacturing of Aluminium plates and strips at the CHINALCO-SWA Co, Ltd. production plant (China).</p> <p>Supply Chain Activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-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	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 8 March 2024 – 7 March 2027

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DATE 7 March 2027

CERTIFICATE NUMBER 346



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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The CHINALCO-SWA Co., Ltd. (the 'Entity') is located in Xipeng, Jiulongpo District, Chongqing and was established in 2004. The Entity is located within an industrial park developed by the local Government and the area under management is approximately 235,000 square metres. It mainly produces Aluminium and Aluminium alloy plates, strips, foils, tubes, rods, profiles and forgings, forming a series of pillar Products for aerospace, transportation, electronic information, packaging and printing, building decoration and other Aluminium Products.

The Entity currently employs approximately 300 employees on-site, and most employees are from the local area. The Entity is in close contact with surrounding communities.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
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	Conformance	The Entity has established a Laws and Regulations Control Procedure and complies with applicable national and international laws. It maintains documented procedures for conducting Compliance audits and a comprehensive register of applicable legal requirements. The Environment, Health and Safety (EHS) Department and the Administration Department are responsible for collecting and assessing Applicable Law and regulations at least annually.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-Corruption and Anti-Bribery Management Procedure that defines requirements for preventing Bribery and Corruption. An anti-Bribery management team has been formed to conduct regular assessments, establish Bribery risk assessment criteria, and provide ongoing employee training. The Administration Department annually reviews and evaluates the implementation of anti-Bribery measures to determine their adequacy, effectiveness, and the Entity's overall Bribery risk status.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct incorporating Environmental, Social, and Governance (ESG) principles. The Code is reviewed annually through internal audits and management reviews and is updated as necessary to reflect changes in laws and Business trends. Employee awareness of the Code is promoted through meetings, training, and other communication measures. The Code of Conduct is publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022343525300416.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has established an Environmental, Social, and Governance (ESG) Policy which has been approved by the Plant General Manager. The Policy is publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022340929116725.pdf https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022340774841469.pdf https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022340627725900.pdf The Entity has established an ASI Performance Standard Manual that includes relevant Policies and procedures. Interviews undertaken during the audit indicated however that employees were not sufficiently familiar with the ASI Environmental, Social, and Governance (ESG) Policies.
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative with clearly defined responsibilities and authority. This Representative has overall responsibility for ensuring Conformance with the ASI Performance Standard, implementing the relevant Policies, and communicating those Policies. The Representative is also authorised to provide the necessary resources to establish, implement, maintain, and continually improve the Management Systems required by the ASI Performance Standard.

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 Certification.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented an integrated Management System. It holds ISO 14001:2015 and ISO 45001:2018 certifications and has established a Social Management System and an ASI Management System. Internal audits and management reviews are conducted annually to ensure the effectiveness of the Entity's ASI Management System.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that conform to responsible sourcing requirements. The Policy is reviewed at least every five years or following significant changes to the Business or its nature. The purchasing Policy is available in the Entity's ASI Policy – Environment, Governance, Social, Responsible Sourcing, available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022341347977307.pdf</p> <p>The Entity implements responsible sourcing by signing ASI commitment letters, conducting supplier assessments, and emphasising supplier Compliance with ASI Performance Standard requirements.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned.</p> <p>Should New Projects or Major Changes occur, environmental, social, cultural, and Human Rights impact assessments, including a gender analysis, will be conducted as part of the mandatory review of project documentation by the responsible state authorities.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned.</p> <p>Should New Projects or Major Changes occur, environmental, social, cultural, and Human Rights impact assessments, including a gender analysis, will be conducted as part of the mandatory review of project documentation by the responsible state authorities.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001 and ISO 45001 Certifications. Emergency Response Plans have been developed and implemented, and are reviewed every five years, or if there are changes to the Business or the nature or scale of emergency risks, in accordance with Chinese legal requirements. Personnel training and drill records were verified during the Audit. The emergency response plan is publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022343182582157.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business resilience plan to address the suspension or significant alteration of operations due to conflict, pandemics, natural disasters, cyber-attacks or other disruptions.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Mergers and Acquisitions Management Procedure. To date, no mergers or acquisitions have taken place.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity does not plan any closure, decommissioning, or divestment activities in the foreseeable future. When applicable, the Entity will manage these activities through its corporate functional teams, conducting a review of environmental, social, and governance impacts and, where possible, consulting with affected communities and organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed an annual Sustainability Report outlining its sustainability approach and summarising its environmental and social impacts. The Report is available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022343748499388.pdf
3.2 Non-compliance and Liabilities	Conformance	No non-Compliance incidents or liabilities are reported in the Sustainability Report. According to Government sources (https://www.gsxt.gov.cn) and Non-Governmental Organisation (NGO) databases (https://www.qcc.com/), no such instances have been raised by relevant authorities.
3.3a-c Payments to Governments	Conformance	The Entity makes, or has made on its behalf, payments to governments solely on a legal and/or contractual basis. These payments are transparently reported in the annual Financial Audit Report, with supporting tax payment certificates available. Information on tax, financial, or in-kind political contributions is available in the Sustainability Report, page 17: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022343748499388.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established and operated a Stakeholder Complaints, Grievances and Requests Procedure. This procedure publicises the Entity's contact information, including telephone number, email address, and suggestion boxes, via public boards, and accepts inquiries, complaints, and appeals from all Stakeholders. The Human Resource Department monitors and tracks Stakeholder requests and complaints and ensures they are addressed through an appropriate Resolution Mechanism. The procedure is available as 'Feedback Management Procedure' at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251022344577911246.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to Life Cycle Assessment (LCA) requirements. During the Audit, LCAs for all relevant Products were confirmed as in Compliance with the LCA management procedure. The LCA report is available at: https://xnl.chinalco.com.cn/bdgs/bdgsdg/202510/P020251014551594102486.pdf The emission factor used, however, is not based on primary data or regional averages, and therefore may not accurately reflect actual emissions.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has provided 'cradle-to-gate' Life Cycle Assessment (LCA) information for its Aluminium Products. The LCA focuses on the environmental life cycle impacts of these Products and was conducted in accordance with ISO 14040 and ISO 14044 to ensure consistency and comparability of assessments. LCA studies are available upon customer request. The Environmental Life Cycle Assessment Report is available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251014551594102486.pdf .
4.2 Product Design	Conformance	The Entity has established and implemented a Product Design Procedure that incorporates relevant objectives into the design and development process to enhance sustainability, including consideration of 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 generated Scrap for collection, recycling, or reuse. A Scrap Classification and Management Procedure has been implemented to categorise and manage different types of Aluminium Scrap. All Scrap is separated by alloy type and sent to appropriate smelters, with records maintained for review.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed a recycling strategy that includes specific timelines, activities, and targets. The Entity is engaging with key customers to improve the end-of-life recycling rate of its Products. As there are currently no comprehensive local, regional, or national Aluminium Scrap collection and recycling systems in China, the Entity works with customers to determine the best approach. Recycling contracts and related records for end-of-life Product collection are maintained.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity annually accounts for and publicly discloses Material GHG emissions and energy use by source, available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251014550896258069.pdf Some data included in the Report, however were derived from international databases and do not reflect the Entity's actual conditions in China.
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 -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has adopted ASI Pathway Calculation Tool to establish short- and medium-term GHG emissions reduction targets, including specific intensity indicators and reduction pathways. These targets address technological upgrades to reduce electricity consumption during electrolysis, the elimination of outdated production lines, procurement of renewable energy, and selection of raw material suppliers with low GHG emissions footprints.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	The Entity has adopted ASI Pathway Calculation Tool to establish short- and medium-term GHG emissions reduction targets, including specific intensity indicators and reduction pathways. These targets address technological upgrades to reduce electricity consumption during electrolysis, elimination of outdated production lines, procurement of renewable energy, and selection of raw material suppliers with low GHG emissions footprints. The Entity's GHG Emissions Reduction Work Implementation Plan is available at: https://xn.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022343906553636.pdf Some emission factors used in the plan, however, are derived from international averages and do not accurately represent the Entity's actual operational conditions.
5.4 GHG Emissions Management	Conformance	The Entity has implemented a GHG Management System, including relevant tools, databases, inventories, and targeted emission reduction pathways. A GHG management procedure and emission source identification table have been established to monitor emissions and support performance to align with the GHG Emissions Reduction Plan and its targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity has quantified air pollutants in the Environmental Impact Assessment Report. Treatment Facilities are in place and the Entity regularly monitors air emissions, ensuring Compliance with local legal limits. The Entity's Wastewater and Waste Air Emission Reduction Plan to minimise exposure, impacts, and emissions to air is available at: https://xn.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251126390919014266.pdf The actions and measures outlined in the emission reduction plan, however, lack sufficiently defined details.
6.2a-g Discharges to Water	Minor Non-Conformance	Discharges to water are managed within the Environmental Management System. The Entity has set water reduction targets and developed a plan to minimise adverse impacts. Monitoring reports for wastewater indicate that major pollutants are being tracked, and the results meet local legal discharge limits. The Entity's Wastewater and Waste Air Emission Reduction Plan to minimise exposure, impacts, and discharges to water is available at: https://xn.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251126390919014266.pdf

CRITERION	RATING	COMMENT
		Whilst the Entity has established plans to minimise wastewater emissions, the actions and measures within the plans, however, lack sufficient clarity.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted regular Spill and Leakage assessments, including a risk factor list. No high-risk situations have been identified, and preventive actions or improvement programmes have been implemented for potential risks. The Spill and Leakage assessment and management plan is defined within the Environmental Management System and follows the control measures outlined in the Spill risk factor list. Major Spills and Leakages will be handled and communicated by the emergency response team. The assessment and management plan is reviewed annually and can be accessed at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022344095030789.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's emergency response plan and guide outline the procedures for Spill disposal and reporting. In the event of a Spill, the Emergency Response Team (ERT) would follow the response process, with annual Spill drills conducted to ensure the process remains current. No Spills have occurred in recent years. The plan specifies that Spills will be reported immediately to local authorities, affected parties, and disclosed in the annual Continual Development Report in the Sustainability Report, section 4.1.3, available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022343748499388.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has established an ISO 14001 certified Environmental Management System. The Waste Management Procedure defines the processes for Waste collection and disposal, with continual improvement targets set to reduce Waste generation per unit. These targets are reviewed quarterly by the management team. The annual quantities of Hazardous and Non-Hazardous Waste generated, along with disposal methods, are reported in the Sustainability Report, page 50, available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022343748499388.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has conducted water-related risk analysis, including water balance assessments, to identify and map the sources and types of water it withdraws and uses. The Entity has a water balance data table for 2024, along with water resource management goals, plans, and a water balance chart. Water risk assessments have been conducted, considering risks in the industrial park, nearby lands, and local waterways within the Entity's Area of Influence. Due to the nature of the Products and production processes, and the implementation of closed-loop water Management Systems at most sites, water-related

CRITERION	RATING	COMMENT
		risks in the local environment are considered low. The Entity's Water Balance Test Report is available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251014553424341806.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as no significant water-related risks have been identified within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has established procedures for Biodiversity protection and has prepared a Biodiversity risk assessment report. Located in an industrial park developed by the local Government, the area does not contain protected flora or wildlife. As such, there is no significant risks to Biodiversity.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify any significant risk or impact on Biodiversity or Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify any significant risk or impact on Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has established Biodiversity protection procedures, including requirements for managing Alien Species as outlined in the ASI Performance Assurance Manual. This includes evaluating and controlling the risks of Alien Species that may be inadvertently introduced through operational activities. The Biodiversity risk assessment report indicates that the only potential source of Alien Species introduction is the wooden pallets used for Product packaging. All pallets are fumigated prior to use to prevent the introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has outlined the relevant requirements for commitment to 'No Go' in World Heritage Properties in its ASI Performance Assurance Manual. This includes a commitment not to explore or develop New Projects or make Major Changes in World Heritage Properties. The Entity is located within an industrial park developed by the local Government, and there are no World Heritage Properties within this area.
8.6a-d Protected Areas	Conformance	The Entity has outlined the relevant requirements for Protected Areas in its ASI Performance Assurance Manual. The Entity is located within an industrial park developed by the local Government, and there are no Protected Areas in this vicinity.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 policy commitment to respect Human Rights, respect employees' civil rights and eliminate discrimination. The Policies are available for internal and external stakeholders by training, is reviewed at least every 5 years or resulting from the annual HSE and social risks assessment. For more information, refer to: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022340774841469.pdf</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, and no adverse Human Rights impacts have been reported since its establishment and therefore remediation is not required.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has developed a Women's Protection Management Procedure to safeguard women's rights and interests. The Entity has clarified women's legitimate rights and implemented control measures to ensure these rights are upheld. A Gender Equality Project Implementation Plan has been implemented and reviewed annually.</p> <p>No complaints have been received from female Workers, who are aware of their rights. Measures to promote gender equity are publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202511/P020251126397091337256.pdf</p> <p>The Gender Equality Project Implementation Plan, however, is incomplete, and the measures and methods for evaluating the plan require improvement.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has developed a Cultural and Sacred Heritage Protection Management Procedure. The Construction Project Environmental Impact Report, evaluated and issued by the Chongqing Environmental Science Research Institute, indicates that the Entity is located within an industrial park developed by the Chongqing Government, with no cultural or sacred heritage features present in the area.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage sites and values situated within the Entity's Area of Influence.
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 joining ASI that could cause displacement, or require Resettlement or land acquisition.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed and implemented a procedure for managing interactions with Affected Populations and Organisations, committing to respect legal and customary rights related to land, livelihoods, and natural resource use. The Entity also seeks to support and enhance community livelihoods within the industrial economic zone. No complaints have been received from Local Communities, and the Entity maintains close contact with surrounding areas. Most of its employees are from Local Communities.</p> <p>The Facility has installed environmental protection devices, including air emission treatment systems, to minimise impacts from air emissions and noise on surrounding communities, as outlined in the Environmental Impact Assessment Report.</p> <p>The Entity also participates in community welfare activities and has established a plan to support Local Communities, which is available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg/202510/P020251022482446335851.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity has established a supply chain Policy, outlining responsibilities, resources, information gathering, and supplier engagement. This Policy is available at: https://xnl.chinalco.com.cn/bdgs/bdgsgg/202510/P020251022483118584726.pdf</p> <p>A review of internet resources, along with interviews with management, employees, and workshop chiefs at the Entity's scope Facilities undertaken during the Audit did not reveal any contribution to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs).</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Minor Non-Conformance	<p>The Entity has conducted a risk-based Due Diligence process over its supply chain, which is embedded in the integrated Management System and purchasing procedures. The processes have not identified any actual or potential risks.</p> <p>Some supply chain Due Diligence information however lacks adequacy.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk-based Due Diligence did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has developed an annual supply chain Due Diligence report in Compliance with the conflict minerals Policy and supplier sustainability approach. A review of the report, along with internet resources and interviews with employees and workshop chiefs, did not indicate any contribution by the Entity to armed conflict or Human Rights abuses in CAHRAs. The Entity's Supply Chain Due Diligence Report is available at: https://xn.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251014549722370104.pdf
9.9 Security practice	Conformance	The Entity has implemented a Security Service Management Procedure. It defines the primary role of security guards as protecting people, property, and assets while respecting Human Rights. All security guards have received training on Human Rights requirements. To date, no security-related Human Rights violations have been reported.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has developed and implemented a procedure to uphold the rights to Freedom of Association and Collective Bargaining. It is committed to respecting Workers' rights and has established Labour Unions and Worker associations in Compliance with legal requirements. These organisations represent staff on issues such as labour remuneration, working hours, rest and vacation, Health and Safety, vocational training, insurance, and welfare. Although no formal collective bargaining agreements exist, the Entity respects Workers' rights to Collective Bargaining and has a Policy to uphold Freedom of Association and Collective Bargaining rights.
10.2a-c Child Labour	Conformance	The Entity has formulated and implemented a Policy prohibiting the use of Child Labour. In Compliance with Labour Law, young Workers are given special protection and are not permitted to work in hazardous conditions. The age of candidates is verified through ID checks and interviews. There is no Child Labour or young Workers employed by the Entity, with the youngest Worker on site currently 23 years old. The Entity communicates its requirements to both Workers and suppliers to ensure Compliance with legal standards regarding Child Labour and young Workers, both within the Entity and across the supply chain.
10.3a-c Forced Labour	Conformance	The Entity has established and implemented a procedure to prevent involuntary labour, committing itself and its suppliers to comply with the prohibition of Forced Labour, slavery, and Human Trafficking. Interviews with Workers (including on-site accommodation Workers), management, and document reviews confirm that employees are not required to pay any form of deposit, recruitment fee, or advance at any stage of employment. There are no restrictions on Workers' freedom of movement, either on-site or in accommodation. Workers are free to leave the factory when not working and can move freely to access basic needs. No Forced Labour has been identified at the Entity, and no foreign Migrant Workers are employed. The Entity does not provide loans to

CRITERION	RATING	COMMENT
		Workers, and no debt bondage terms are found in labour contracts. Pay slips show no illegal deductions. The Entity's Modern Slavery Statement, which addresses Forced Labour, is publicly available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022344745240618.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has an anti-Discrimination, Harassment, and abuse procedure in place. It does not engage in or support Discrimination in hiring, salary, promotion, training, advancement, or termination of any Worker. The Non-Discrimination Policy is included in employee training during onboarding and in the annual re-calibration sessions. Equal opportunities and non-Discrimination are demonstrated through Worker interviews and the results of the annual Business conduct and conflict surveys.
10.5 Communication and engagement	Conformance	The Entity has formulated and implemented an employee complaints management procedure. Regular meetings between the Labour Union and top management, along with a grievance and complaint hotline, email, and established operating procedures, ensure open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues. This process operates without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has maintained a corporate Policy to prevent workplace Harassment and Violence. This Policy includes training on Harassment prevention and countering Discrimination. To combat Discrimination, the Ethics and Compliance Integrity Line is available in all languages, allowing employees to report Harassment and Violence anonymously. The Entity's Promote Gender Equality, Anti-Violence, and Harassment Policies are available at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251014550547463951.pdf
10.7a-c Remuneration	Conformance	All payments to Workers are documented and made promptly via bank transfer on the 18th of each month. Workers receive remuneration for Overtime, public holidays, rest days, and night shifts. Each month, employees are provided with a payslip detailing their wages, calculations, and deductions (e.g., taxes).
10.8a-c Working Time	Conformance	The Entity has implemented an attendance and working hours system. Based on attendance records from sampled employees over the past 12 months and Worker interviews, working hours are monitored and comply with Chinese Labor Law. Overtime is voluntary, and employees can refuse it if they choose. The factory operates on a 3-shift system, with no mandatory Overtime. Total weekly hours do not exceed 60, and at least one day of rest per week is guaranteed.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights through various channels, including the employee handbook, electronic boards, public bulletin boards in each workshop, training sessions, personal consultations, and meetings.

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity holds a valid ISO 45001:2018 Certification, covering the entire Certification Scope. The Entity has established formal Occupational Health and Safety (OH&S) Policies, which are posted in internal public areas.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity holds a valid ISO 45001:2018 Certification, covering the entire Certification Scope. The effectiveness of the OH&S Management System is available in the Sustainability Report, pages 41-44, at: https://xnl.chinalco.com.cn/bdgs/bdgs/gg/202510/P020251022343748499388.pdf</p> <p>The public disclosure of comparative performance analyses with peer Businesses and leading practices, however, is not sufficiently clear.</p>
11.2 Employee engagement on Health and Safety	Minor Non-Conformance	<p>The Entity has established procedures for OH&S control, including safety committee meetings, suggestion boxes, employee congresses, and periodic Worker interviews. Records have been well maintained since the procedures' implementation.</p> <p>On-site observations, however, revealed that degreasers stored in the hot rolling workshop lacked leak-proof secondary containers.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 March 2023	Initial Certification Audit – Full Certification
1	10 February 2026	Surveillance Audit