

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Chalco Shandong Advanced Material Co., Ltd

CERTIFICATE NUMBER
351

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
9 MAY 2024

DATE OF EXPIRY
8 MAY 2027

CERTIFIED SINCE
9 MAY 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

Production of high-end Alumina
Products at Chalco Shandong
Advanced Material Co., Ltd, Zibo
City, Shandong Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Chalco Shandong Advanced Material Co., Ltd
ENTITY NAME	Chalco Shandong Advanced Material Co., Ltd
CERTIFICATION SCOPE	Production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (7 – 10 November 2023)Surveillance Audit (10 – 11 September 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">7 – 10 November 2023 (Initial Certification Audit)10 – 11 September 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 December 2023 (Initial Certification Audit)19 December 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (7 – 10 November 2023)</u></p> <p>The Audit Scope included the production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (10 – 11 September 2025)</u></p> <p>The Audit Scope included the production of high-end Alumina Products at Chalco Shandong Advanced Material Co., Ltd, Zibo City, Shandong Province, China, including production processes and auxiliary activities such as warehousing and hazardous waste management.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <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:

- ☑ 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.

CERTIFICATION PERIOD

9 May 2024 – 8 May 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

8 May 2027

CERTIFICATE NUMBER

351



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

Chalco Shandong Advanced Material Co., Ltd. (the 'Entity') is a subsidiary of Aluminium Corporation of China Limited (Chalco, also known as CHINALCO), and specialises in producing high-end Alumina Products. The Entity's main Products include 4A zeolite, pseudo-boehmite, and five other Alumina Products. These Products are primarily used as fillers and additives in industries such as everyday chemicals and glass manufacturing. The Entity is located within the industrial park of CHINALCO in Zibo, Shandong Province, which was established in 1958.

The Entity's main production processes include raw material slurry preparation, clinker sintering, leaching, red mud separation and washing, liquor purification, evaporation, seeding, and Product packaging.

The Entity produces 10,000 tonnes of PHS series pseudo-boehmite for hydrocracking per annum. It employs approximately 1,360 people, including 170 women.

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	High	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL				MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a management process for identifying and assessing ASI-related legal and other requirements. Compliance evaluations are conducted every six months, and the results are systematically recorded.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-Corruption Policy along with a 'whistleblowing' channel, investigation process, and disciplinary procedures. It identifies and assesses risks related to business ethics, determines high-risk positions, and implements associated control measures. The Anti-Corruption Policy is communicated to all relevant Stakeholders. No instances of Corruption have been documented or identified over the previous three-year period.
1.3a-e Code of Conduct	Conformance	As part of the CHINALCO Group, the Entity has implemented an Integrity and Compliance Manual that incorporates environmental, social, and governance principles. Additionally, the Entity has developed and implemented a Code of Conduct based on the Group's Manual. The Code of Conduct is subject to review during management review meetings, major business changes, or when control gaps are identified. Both the Integrity and Compliance Manual and the Code of Conduct are publicly available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373639668463.pdf https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640173362.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented the ASI Policies, which are consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Policies are approved by the General Manager, who demonstrates commitment to implement the Policies through the provision of resources. The ASI Policies are reviewed in the annual management review meeting or when there is a major change in the Business or a control gap is identified. The ASI Policies are disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640177717.pdf
2.2a-c Leadership	Conformance	A senior manager has been appointed as the Management Representative, and the responsibilities and authorities of the Management Representative and other management roles are defined, including leading communication of the Policies and providing the resources needed.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established, implemented and continually improved its Environment Management System, which is certified against ISO 14001:2015.
2.3b Environmental and Social Management Systems - Social	Conformance	A Social Management System has been established and implemented. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated

CRITERION	RATING	COMMENT
		management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented a Policy (Supplier Code of Conduct), systems, Procedures and processes that conform to the responsible sourcing requirements. The Entity has conducted second-party Due Diligence audits at its major suppliers' sites.</p> <p>The Supplier Code of Conduct is disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640180120.pdf</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 significant changes to its Facility since the previous ASI Audit.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or significant changes to its Facility since the previous ASI Audit.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001:2015 ISO 45001:2018 certificates and Emergency Response Plans are developed and implemented. The Entity conducts an annual emergency response drill to assess the effectiveness of the emergency response plans and provides emergency response training to employees.</p> <p>The Entity has committed to reassessing the Emergency Response Plans in the event of any change within the organisation that results in a modification of the nature and scale of emergency risks. Additionally, the Plans are reviewed upon identification of control deficiencies. The Entity's Emergency Plans are publicly disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640202455.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan to address emergency situations which may suspend or alter operations, which considers the Material adverse environmental, social and governance impacts and establishes the associated control measures. The Entity's ASI PS Management Manual accounts for the review of the Continuity and Resumption Plan.
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed a Mergers and Acquisition Management Procedure in accordance with the requirements of the ASI Performance Standard. Mergers are managed at Group level.</p> <p>A merger involving the Entity commenced in December 2024 with the transfer of assets and personnel from the CHALCO Group's 'Functional Materials Plant'. However, this plant is not included within the Entity's ASI Performance Standard Certification Scope. During the merger, a comprehensive Due Diligence process was undertaken to evaluate the environmental, social, and governance practices pertinent to the ASI Performance Standard, encompassing those associated with historical Aluminium operations. Throughout the merger process and after its completion, the Entity ensured thorough communication with affected stakeholders regarding the substantive impacts of past Aluminium operations and subsequent management plans. The Due Diligence Report concluded that the merger had no Material impacts.</p>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a process for closure, decommissioning and divestment, and senior management commits to review environmental, social and governance practices in the planning process for closure, decommissioning and divestment as relevant. However, no such case has occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity is a subsidiary of CHINALCO, which annually publishes its ESG Sustainability Report, available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251201371294822786.pdf</p> <p>The Sustainability Report discloses the Entity's mechanisms for identifying Material Environmental, Social and Governance (ESG) issues, as well as management and performance information related to corporate governance, business ethics, Labour Rights, community engagement, environmental management, Health and Safety, and responsible sourcing.</p> <p>The performance information however for certain ESG-related Material impacts disclosed in the Sustainability Report is insufficient.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The official websites of relevant government agencies and other Non-Government Organisations confirm that the Entity did not receive any Material fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law in 2023-2024. The Entity has disclosed a Compliance Operation Statement, available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640718969.pdf</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. These payments are disclosed in the Annual Sustainability Report, page 20: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251201371294822786.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The CHINALCO Group has established a Complaints Resolution Mechanism with multiple 'whistleblowing' or complaints channels for internal and external Stakeholders, including the Group's hotline (86-10-82298446) or email (compliance-Chalco@Chinalco.com.cn). At the Entity level, a separate hotline (0533-2945228) and email (1145218428@qq.com) are available for reporting misconduct or complaints. The Entity has a well-defined process for recording, reporting, and handling grievances, with no complaints received so far.</p> <p>The Complaints Resolution Mechanism is reviewed annually during management reviews or when significant business changes or control gaps arise. It is publicly disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640927936.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted an environmental Life Cycle Assessment (LCA) on its main Product series. The assessment was conducted in accordance with relevant provisions of international standards such as ISO 14040, ISO 14044 and T/CNIA 0076-2021. The LCA was performed

CRITERION	RATING	COMMENT
		using the eBalance software and utilised relevant data from the CLCD, ELCD and Ecoinvent databases.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has disclosed 'cradle-to-gate' LCA information for its main Products, which includes basic assumptions, system boundaries, and associated data. The LCA reports are available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/t20250908_154620.html
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has commissioned a Third Party to account its Greenhouse Gas (GHG) Emissions within the defined boundary following the defined accounting protocol, including Scopes 1 and 2 and the major Scope 3 emissions, including purchased raw materials and transportation The emissions factors for purchased raw materials however are from the database and not the emissions factors directly from suppliers.
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 uses the ASI Entity GHG Pathway Calculation Tool to ensure a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario. . The Entity has used a 2024 baseline year and as such it was not required to demonstrate performance at this Audit.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity uses the ASI Entity GHG Pathway Calculation Tool to ensure a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario. It has used 2024 as the baseline year and established five years reduction targets.

CRITERION	RATING	COMMENT
		<p>The Entity has established a process to review the achievement of the GHG emission reduction targets annually or following any major changes at the Entity. The GHG emissions reduction target are publicly disclosed at:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641002327.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan to define the management approaches to reducing GHG emissions, with the main focus on energy management. Site observations, document review and interviews confirmed that, following the Plan-Do-Check-Action approach, the Entity manages its energy consumption. It monitors the Management System to achieve performance aligned with its GHG Emissions Reduction Plan.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity regularly monitors its Emissions to Air to ensure Compliance with Applicable Laws and regulations. The Entity has disclosed its air pollutant emissions, available at:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641021047.pdf.</p> <p>The Entity has taken necessary measures to reduce exhaust gas emissions, and has plans to further reduce emissions, such as the 'clinker kiln CO governance' project and clinker warehouse dust collection system renovation project. The Entity has committed to review and revise its management plan whenever any changes in the Business alters the primary risks associated with atmospheric pollutant emissions.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has disclosed its wastewater discharges, including types and quantities, through the Water Risk Impact Assessment and Pollution Discharge Permit Compliance Report, available at:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641040636.pdf</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641021047.pdf</p> <p>Currently, the Entity's primary wastewater discharge consists of domestic sewage, while all process-related wastewater is recycled, resulting in no industrial wastewater discharge. The discharge of domestic sewage constitutes only a negligible portion of the overall water consumption in the Facility. Therefore, the Entity does not require additional emission reduction plans.</p> <p>Furthermore, the Entity has established a Wastewater Management Program and committed to reviewing and revising the plan whenever there are significant risks that may impact water pollutant discharge or indications of an escalation in water pollution, particularly in the event of any changes at the Entity.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established a risk assessment and management Procedure, which identifies and evaluates the risks of Spills and Leakages, and has implemented corresponding emergency response measures and plans. The Identification of Leakage Hazard Sources Report and Emergency Response Plans are available at:</p>

CRITERION	RATING	COMMENT
		<p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641003692.pdf</p> <p>The Entity has conducted regular inspections to identify potential hazards related to Spills and Leakages and prepared a Safety and Environment Inspection Report. The Entity has committed to review the relevant management plans whenever any changes in the Business alters the substantial risks associated with Spills and Leakage, as well as when there are indications of control deficiencies.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has outlined the process for reporting Spills and Leakages in its environmental management Procedure and the Emergency Response Plans. There have been no recorded incidents of Spills in the past three years. The most recent versions of the Spills and Leakages risk assessment report and the Emergency Response Plan are available:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641003692.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is addressed in the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy and mitigates its Material impacts by re-using and recycling Waste. The disposal of Hazardous Waste complies with Applicable Law. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity from its activities in 2024 is disclosed at:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641013874.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's as the Bauxite Residue storage facility currently utilised by the Entity is managed by CHINALCO Shandong Mining Company, a subsidiary of the Entity's parent company. Over the past three years, there have been no significant incidents compromising the safety and environmental integrity of the Bauxite Residue disposal.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.8a-d Dross	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has undertaken environmental impact and water resource risk assessments and documented its water intake and usage by source and type. The risk assessment and water balance diagram area available at:</p> <p>https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641040636.pdf</p> <p>The risk assessment considered the surrounding water environment, water intake and discharge, as well as the effectiveness of existing management measures, and determined the Entity's water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence.</p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The assessment of Biodiversity and Ecosystem Services risks and impacts have been incorporated into the EIA, which was conducted by a qualified Third Party and approved by the local environmental protection agency. Based on the EIA Report and the results of the Biodiversity Risk Assessment, there are no Biodiversity-sensitive areas within the Entity's Area of Influence. The Entity is located within an industrial zone planned by the local government and has an effective Environmental Management System. Therefore, the level of risk is considered low. The Biodiversity Assessment Report is available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641094654.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks to and potential impacts on Biodiversity and Ecosystem Services have been assessed and documented as low. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks to and potential impacts on Biodiversity and Ecosystem Services have been assessed and documented as low.
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 implemented a management Policy and Procedures that are designed to prevent the introduction of invasive species. The potential risks associated with the introduction of such species through the Entity's operations and logistics activities have been identified and assessed to determine if these activities could significantly harm Biodiversity and Ecosystem Services. The Biodiversity Assessment determined the risk of the Entity's activities introducing invasive species as low.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity's Management Manual has established its commitment to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity's Management Manual has established its commitment to protecting the environment. There are no Protected Areas in the Entity's Area of Influence.
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

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Policy committed to respecting Human Rights, including gender equity, and communicated it to all employees. The Policy is available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640177717.pdf</p> <p>Additionally, the Entity has established and implemented a Human Rights Due Diligence process. This process includes mapping the Affected Populations and Organisations, identifying and assessing risks to Human Rights, and developing a control plan to address potential Human Rights impacts. The implementation of this control plan is actively monitored. The Human Rights Due Diligence process is reviewed annually as part of the annual management review meeting.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect the rights of women and a program including a special agreement on women Workers' rights signed between the Entity and the Trade Union to promote gender equity and women's empowerment across the whole employment process. No complaints have been received from women Workers. Interviewed women Workers confirmed that they knew their rights. The Entity regularly reviews the effectiveness of its gender equality measures. Further information is available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641110560.pdf</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's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify and assess cultural and sacred heritage sites and values, aiming to minimize any potential impact on them. There are 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 there are no cultural or sacred heritage sites or values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Changes or New Projects causing resettlements in the history of the Entity.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Stakeholder engagement process to proactively address the concerns of Affected Populations and Organizations, supported by plans covering areas such as environmental and social impacts. These plans are reviewed annually, with improvements implemented as needed. The Entity discloses its performance in executing these plans in its Annual Sustainability Report and on the government-designated environmental management information platform. Further detail is available in the Sustainability Report, page 19: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373640249190.pdf and https://permit.mee.gov.cn/perxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&dataid=1ef6a81df3ac4352bb9736cf62bafee
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Policy to commit to not using conflict minerals and implemented a Management System. Training has been provided for all relevant employees, and the Policy and requirements are communicated to suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment and requires suppliers to complete the Responsible Minerals Due Diligence Management forms to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs). The risk assessment report determined that there are no materials from CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The risk assessment report determined that there are no materials from CAHRAs and no red flags in the supply chain. The Entity maintains a business relationship with its material suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported on the performance of its supply chain Due Diligence in its 2024 Progress Report, available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P02025101637364111476.pdf
9.9 Security practice	Conformance	The responsibilities and authorities of security guards are limited to safeguarding property, vehicle management and visitor registration. Body searches are not permitted, and restrictions on the workers' movement are prohibited. Training is provided to security guards. No complaints regarding security activities have been received to date.
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 it complies with Applicable Law in China regarding the Freedom of Association and Collective Bargaining. There is a Labour Union at the Entity with nine members.
10.1d Freedom of Association and Right to Collective Bargaining -	Conformance	There is a Labour Union and a Collective Bargaining Agreement at the Entity. Employees in each department elect their representatives each

CRITERION	RATING	COMMENT
Alternative means in context of Applicable Law		year. The employee representatives are involved in Collective Bargaining and issues regarding the Workers' rights and wellbeing.
10.2a-c Child Labour	Conformance	The Entity has implemented Policies in Compliance with the Chinese Law explicitly banning Child Labour (under 16 years old) and safeguarding the young Workers. No underage individuals are employed by the Entity.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has established a Policy against Forced Labour and Human Trafficking, committing itself and requiring suppliers to comply with these standards. Workers are directly hired without fees, deposits, or loans and retain their identity documents. The Entity respects workers' freedom of movement, with no unreasonable restrictions observed, and allows them to freely terminate their employment with prior notice. The 2025 Modern Slavery Statement is disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641132737.pdf</p> <p>The Modern Slavery Statement however lacks a systematic and comprehensive explanation of the actions taken by the Entity to address modern slavery.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established a commitment to non-Discrimination. The Entity's recruitment advertisements, training and promotion opportunities and termination records indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The payment records demonstrate equal pay for the same work. Workers interviewed confirm they feel they are treated equal and, to date, no case of Discrimination has been reported. The Entity provides training courses on Discrimination to Promote a culture of non-Discrimination.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication mechanisms with the Workers and the Worker's representatives. The communication channels are announced to Workers and Workers can raise complaints and concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has a Policy prohibiting any form of Violence and Harassment. With Workers' participation, the Entity has identified and assessed the risks of Violence and Harassment and implemented control measures to prevent it from occurring. Training is provided to all Workers to inform the process of reporting cases of Violence or Harassment.</p> <p>The Policy is reviewed in the annual management review meeting or when there is a major change in the Business or upon identification of a control gap. The Policy on Violence and Harassment is disclosed at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641141859.pdf</p>
10.7a-d Remuneration	Conformance	The wage structure is clearly defined, with the basic wage exceeds the local legal minimum, and Overtime compensation fully complies with legal requirements. Mandatory allowances ensure Workers' essential needs are met, and all employees are enrolled in compulsory social insurance. Wage payments are promptly disbursed via bank transfer on the 15 th of the following month, with documentation maintained.

CRITERION	RATING	COMMENT
		Workers can easily access comprehensive details on wages, allowances, Overtime, and deductions through the internal office automation OA system.
10.8a-c Working Time	Conformance	Working hours at the Entity are recorded by a finger-scanning meter or facial recognition device. The regular working hours are eight hours a day, five days a week, with a total of 40 hours a week. Working hours are monitored and controlled, and the monthly Overtime working hours do not exceed the legal monthly limit, and one day off a week is guaranteed.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures Workers are well-informed of their rights and responsibilities through comprehensive communication methods, including orientation training for new Workers covering rights, workplace policies, and procedures. An Employee Handbook provides detailed guidance on employment terms and working conditions, while on-site billboards share important updates and reminders. Regular communication sessions are also held to keep Workers informed.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System that is ISO 45001:2018 certified and continually improved. Through on-site observations, document review, and interviews with management and Workers, it has been determined that the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has conducted periodic reviews of its Occupational Health and Safety (OH&S) Management System through various means, including monthly safety meetings, annual evaluation of legal compliance, annual internal audits, and management review meetings.</p> <p>Reviews are conducted upon any indication of a control gap to assess if potential corrective and/or preventive actions should be implemented. The Entity's OH&S objectives and targets during 2024, as well as comparative analyses of performance with peer businesses and leading practices, is integrated into the performance of the CHINALCO Group. The report is available at: https://sdly.chinalco.com.cn/shzr/shzrbg/202509/P020251016373641152522.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a system for Workers' consultation and participation in OH&S matters. Workers are encouraged to report their concerns or provide advice on OH&S issues individually or through a Worker representative. The management of the Entity responds to these concerns and advice.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 May 2024	Certification Audit - Full Certification
1	6 February 2026	Surveillance Audit
