

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Shangqiu Yangguang Aluminium Product Co., Ltd.

CERTIFICATE NUMBER  
113

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE  
18 JANUARY 2024

DATE OF EXPIRY  
17 JANUARY 2027

CERTIFIED SINCE  
18 JANUARY 2021

## AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'A' followed by a horizontal line.

Aluminium Stewardship Initiative Ltd  
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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](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Production and Sales Service of  
Aluminium and Aluminium Alloy  
Plate, Sheet, Strip and Related  
Management Activities (China).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	Shangqiu Yangguang Aluminium Product Co., Ltd.
CERTIFICATION SCOPE	Production and Sales Service of Aluminium and Aluminium Alloy Plate, Sheet, Strip and Related Management Activities (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (19 – 20 October 2020)</li><li>• Surveillance Audit (20 – 21 June 2022)</li><li>• Re-Certification Audit and Scope Change (9 – 10 October 2023)</li><li>• Surveillance Audit and Scope Change (27 – 28 October 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 19 – 20 October 2020 (Initial Certification Audit)</li><li>• 20 – 21 June 2022 (Surveillance Audit)</li><li>• 9 – 10 October 2023 (Re-Certification Audit and Scope Change)</li><li>• 27 – 28 October 2025 (Surveillance Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 22 December 2020 (Initial Certification Audit)</li><li>• 13 July 2022 (Surveillance Audit)</li><li>• 27 November 2023 (Re-Certification Audit and Scope Change)</li><li>• 16 December 2025 (Surveillance Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (19 – 20 October 2020)</u></p> <p>Shangqiu Yangguang Aluminium Product Co., Ltd. is located at No. 1, Xinfeng Road, LiZhuang Town, Liangyuan District, Shangqiu City, Henan Province, China. The main products include Aluminium and Aluminium Alloy Plate, Sheet and Strip. The main production processes include Casting, cold rolling, annealing and packing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Casthouses</li><li>• Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (20 – 21 June 2022)</u></p> <p>The Audit Scope covers the main products including Aluminium and Aluminium Alloy Plate, Sheet and Strip. The main production processes include Casting, cold rolling, annealing and packing.</p>

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Supply chain activities included in the Audit Scope:

- Casthouses
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (9 – 10 October 2023)

The Audit Scope covers the main products include Aluminium and Aluminium Alloy Plate, Sheet and Strip. Main production processes include Casting, cold rolling, annealing and packing.

Supply chain activities included in the Audit Scope:

- Casthouses
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit and Scope Change Audit (27 – 28 October 2025)

The Audit Scope covers the main products include Aluminium and Aluminium Alloy Plate, Sheet and Strip. Main production processes include Casting, cold rolling, annealing and packing.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.

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AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
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AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
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CERTIFICATION PERIOD	18 January 2024 – 17 January 2027
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	17 January 2027
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CERTIFICATE NUMBER	113
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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

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

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## ENTITY OVERVIEW

Shangqiu Yangguang Aluminium Product Co., Ltd (the 'Entity') was established in July 2007 and specialises in producing Aluminium and Aluminium Alloy plates, sheets, and strips. Its main production processes include casting, cold rolling, annealing, and packing. In 2022, the Entity produced and sold 90,000 tonnes of Aluminium foil billet. The Entity occupies an area of approximately 23 hectares (ha) and has a workforce of approximately 450 employees. The Entity includes on-site accommodations, administrative offices, supply storage, a workshop, a laboratory, and storage.

The nearest township to the Entity is Li Zhuang, which is located approximately 3.5 kilometres from the Entity. The primary external Stakeholders of the Entity include the Government of China, the Henan Shenhua Group Co., LTD, the local town of Li Zhuang, the local villages in the Caolou, and the Shangqiu City Environmental Protection Bureau.

The Entity is currently undergoing construction activities on-site to increase its capacity to its full potential of 210,000 tonnes by 2026.

## MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has a system in place to identify and assess the applicable legal requirements, maintain awareness of and ensure compliance with applicable legal requirements.
1.2 Anti-Corruption	Conformance	The Entity has implemented Policies and processes to identify and prevent Corruption, including a Procedure on Anti-Corruption. The training courses on these Policies and processes are provided to all relevant employees, and training records are maintained. Per the Register of Misconduct reported, no cases of Corruption were reported in the past three years.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct, including principles related to Environmental, Social and Governance (ESG) performance based on the principles defined in the ASI Performance Standard. The Code of Conduct is disclosed at:</p> <p><a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3884">http://www.shalfoil.com/NewsDetail.aspx?ID=3884</a></p> <p>A mechanism is in place to review the Code of Conduct periodically and when it is needed.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented the management Policies that are consistent with ESG practices. The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies are reviewed at the annual management review meeting and when there is a major change or control gap. The Energy, Environment, Society and Human Rights Policy are available for internal and external Stakeholders at:</p> <p><a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3875">http://www.shalfoil.com/NewsDetail.aspx?ID=3875</a></p>
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative as having overall responsibility and authority for establishing, implementing, maintaining and improving the Management Systems required throughout the ASI Performance Standard and communicating the ASI Policies to all employees.
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. The latest audit was conducted by CQC in January 2025, where one minor non-conformance was issued, which was closed before January 2025.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. The main social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that cover responsible sourcing. The Entity conducts second-party Due Diligence audits of major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing

CRITERION	RATING	COMMENT
		<p>requirements. The Responsible Purchasing Policy is reviewed at the annual management review meeting, and if there is a major change or control gap. The Responsible Aluminium Procurement Due Diligence Policy is available at:</p> <p><a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3872">http://www.shalfoil.com/NewsDetail.aspx?ID=3872</a></p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>There is an extension project for a 55 kt/a New Energy Battery Aluminium Foil billet. The Entity has assessed the environment and social impacts following the applicable legal requirements and implements an environmental and social impact management plan to prevent and mitigate any Material impacts identified. A mechanism is in place to periodically review the environmental and social impact management plan, or when necessary. The Environmental and Social Impact Assessment Report is available at:</p> <p><a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3889">http://www.shalfoil.com/NewsDetail.aspx?ID=3889</a></p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>There is an extension project for a 55 kt/a New Energy Battery Aluminium Foil billet. The Entity has identified and assessed the risks to Human Rights and established the relevant control measures based on the ASI Performance Standard and associated legal requirements. The results of the Human Rights assessment demonstrate that due to the scale and nature of the extension project, the risk and impact on Human Rights is limited. There are no Indigenous Peoples in the Entity's Area of Influence.</p> <p>The assessment report of risk on Human Rights is reviewed in the annual management review meeting. The latest active version of the management plan is available at:</p> <p>Human Rights Impact Assessment Report:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3877">http://www.shalfoil.com/NewsDetail.aspx?ID=3877</a></p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established a Comprehensive Emergency Response Plan, a Special Emergency Plan, and Environmental Emergency Plans. These plans are registered with the relevant government agencies. The Entity provides the relevant training courses to employees and conducts drills. The two emergency response plans are reviewed every three years, or when there is a major change or control gap and resubmitted to the authorities for registration. A summary of the emergency response plans is disclosed at:</p> <p><a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3885">http://www.shalfoil.com/NewsDetail.aspx?ID=3885</a>.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a plan for Business continuity and resumption after disaster, which considers Material adverse ESG impacts. The plan is developed in collaboration with potentially affected Stakeholder groups such as Workers and their representatives. In accordance with the Entity's ASI PS Management Manual, the plan will be reviewed in the annual management meeting, when there are major business changes, or control gaps.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established a procedure for Mergers and Acquisitions; however, no such activity has occurred since the commencement of operations in 2008.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a procedure for Closure, decommissioning and divestment, however, no such event has occurred since the commencement of operations in 2008.</p>

CRITERION	RATING	COMMENT
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts in its 2024 Sustainable Development Report: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3874">http://www.shalfoil.com/NewsDetail.aspx?ID=3874</a>
3.2 Non-compliance and Liabilities	Conformance	There were no monetary fines, judgements, penalties or non-monetary sanctions in 2024. This was verified with management interviews and the official websites of relevant government agencies and Non-Government Organisations (NGOs). The information is disclosed in the Sustainable Development Report, page 18: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3874">http://www.shalfoil.com/NewsDetail.aspx?ID=3874</a>
3.3a-c Payments to Governments	Conformance	In accordance with the Entity's internal control procedure, payments to governments are only made on a legal basis. In China, there are no payments made to political parties. The payment to governments is legally required including social security, fees, and taxes, and no other items. Payments to Governments are reported in the 2024 Sustainable Development Report, page 18: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3874">http://www.shalfoil.com/NewsDetail.aspx?ID=3874</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	In the Complaints Resolution Policy, the 'whistleblowing' of the misbehaviour is encouraged, and the privacy of the 'whistleblower' is guaranteed. The hotline and email address to submit a complaint or grievance or 'whistleblowing' for internal and external persons are published in the emergency preparation and response plan.  The hotline and email address for 'whistleblowing' from internal and external persons and the Complaints Resolution Mechanism are disclosed in the 2024 Sustainable Development Report, pages 18-19: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3874">http://www.shalfoil.com/NewsDetail.aspx?ID=3874</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has assessed the environmental impacts of its main Product line, Aluminium plate strip, using its own established methods. The environmental life cycle assessment (LCA) of the Entity follows the 'cradle-to-gate' approach and includes the disposal process of production waste.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's environmental impact LCA Report provides information on the Aluminium plate strip products from 'cradle to gate'. The Entity commits to providing further data and information regarding the lifecycle of its products upon request from customers. The Entity's environmental LCA Report includes some basic LCA information and assumptions. The Entity has publicly disclosed its LCA Evaluation Report, available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3870">http://www.shalfoil.com/NewsDetail.aspx?ID=3870</a>
4.2 Product Design	Conformance	The Entity itself does not engage in any product design activities, however, incorporates relevant sustainability goals into its production process control and raw material procurement processes to enhance the sustainability of its products, including the environmental life cycle impact of the final products.



CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity has developed and implemented an Aluminium Scrap recycling management program, which requires 100% recycling of the waste generated during the production process. All Scrap is graded and recycled based on alloy composition and content.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	The Entity has developed a strategy to utilise Recycled Aluminium, the ultimate target for 2025 is for the consumption amount of Recycled Aluminium to reach 20,000 tonnes a year, equal to 15% of the total annual raw material consumption of the Entity. The Entity commits to review the achievement of the Recycled Aluminium target every year and adjust the strategy, target and plan regarding Recycled Aluminium after the management review meeting. The recycling strategy is publicly disclosed at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3376">http://www.shalfoil.com/NewsDetail.aspx?ID=3376</a>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The raw material of the Entity includes Aluminium ingots and processing of Aluminium Scrap. Aluminium foil Scrap is collected from external sources, and no ‘end-of-life’ Aluminium is used by the Entity.</p> <p>As there are no complete local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity has partnerships with recycling facilities and commits to maximum recycling quality. The Entity also engages in communication and collaboration with downstream customers on how to improve the recycling rate of products at ‘end-of-life’.</p> <p>The Entity also actively participates in public seminars on topics including post-consumer Aluminium Scrap recycling and commits to taking initiative in public projects to promote the recycling of post-consumer Aluminium Scrap. The Procurement Department is continuing to seek a recycling vendor to improve recycling quality.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has established a procedure in accordance with the ISO 14064 Standard for tracking and managing Greenhouse Gas (GHG) emissions and energy use annually. Direct emissions (Scope 1 &amp; 2) and indirect emissions (Scope 3) are covered and calculated.</p> <p>The 2024 GHG inventory report and accompanying verification statement are available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3883">http://www.shalfoil.com/NewsDetail.aspx?ID=3883</a> <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3881">http://www.shalfoil.com/NewsDetail.aspx?ID=3881</a></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.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has utilised the ASI Entity GHG Pathway Calculation Tool to ensure the GHG Emissions Reduction Pathway is consistent with a 1.5°C warming scenario. The Entity has set 2024 as the baseline year for the

CRITERION	RATING	COMMENT
		five-year GHG reduction targets and the management of emission reduction programs.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has utilised the ASI Entity GHG Pathway Calculation Tool and has set 2024 as the baseline year for the five-year GHG reduction targets and the management of emission reduction programs.</p> <p>The Entity has implemented a process to review the achievement status of the GHG emissions reduction targets annually, or when there is major change. As the baseline is GHG emissions is for 2024, no action is currently needed.</p> <p>The GHG emissions reduction target is publicly disclosed at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3882">http://www.shalfoil.com/NewsDetail.aspx?ID=3882</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established a GHG Emission Reduction Plan to define the management approaches for GHG emissions. The main focus is on energy management. The Entity manages energy consumption and monitors the Management System performance to achieve the GHG Emissions Reduction Plan.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>In accordance with its Environment Management System and legal requirements, the Entity identifies, assesses and quantifies Material Emissions to Air from its activities, and has implemented the control plans to minimise exposure to, and impacts from, Emissions to Air. The Entity monitors the effectiveness of the control plans periodically, and reviews the control plans regularly, and in the case of major change or non-conformance.</p> <p>The statistics on pollutant discharge for 2024, as well as the reduction plan for 2025, addresses air emissions and are publicly disclosed at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3864">http://www.shalfoil.com/NewsDetail.aspx?ID=3864</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity's production process does not generate industrial wastewater and monitors its domestic water uses annually. There is no current water pollutant reduction plan, as there is no identified environmental impact or Material discharges. If future discharges occur, a plan will be developed with regular review to address potential control defects. The pollutant discharge statistical data for 2024 and reduction plan for 2025 address water discharges and are publicly disclosed at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3864">http://www.shalfoil.com/NewsDetail.aspx?ID=3864</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented an ISO 14001 Environmental Management System, with emergency measures and plans for pollution leaks and Spills, based on the approved Environmental Impact Assessment Report. The risk and emergency plans are available at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3885">http://www.shalfoil.com/NewsDetail.aspx?ID=3885</a></p> <p>List of Leakage Risk Identification and Risk Assessment at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3878">http://www.shalfoil.com/NewsDetail.aspx?ID=3878</a></p> <p>The Entity also reviews and amends these plans if significant changes in associated risks or indications of control defects occur.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has defined the processes for reporting Spills and leakages in the environment protection management procedure. The Entity is required to report the accident to the local government agency and the affected parties. No Spills/Leakage have occurred within the past three years.
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is incorporated into the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates material impacts by recycling the waste. The disposal of Hazardous Waste complies with applicable legal requirements.</p> <p>The quantities of hazardous and Non-Hazardous Waste generated in 2024 are available at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3863">http://www.shalfoil.com/NewsDetail.aspx?ID=3863</a></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	Dross is categorised as Hazardous Waste. The Entity follows the applicable legal requirements to collect, label and store Dross. No Leakages have been reported. The Aluminium removed from Dross residue is recycled into melting furnaces, and the remainder is sent to a supplier for disposal who holds all required licences and permits for Dross disposal. The Entity purchases the Aluminium recovered from Dross and Dross residues. The supplier visit report demonstrated that Dross residues are not sent to landfill.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>In the Environmental Impact Assessment, the Entity has identified and documented its water use by source and type. The Entity assesses the water-related risks, considering the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures. There is no Material, significant water-related risks in their Area of Influence.</p> <p>The Water-Related Risks Report, including its water withdrawal and use in 2024, is available at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3880">http://www.shalfoil.com/NewsDetail.aspx?ID=3880</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there were no identified significant water-related risks in their Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Environmental Impact Assessment (EIA) Report is qualified by a third party, who has evaluated the effects of the Entity's operations on Biodiversity. The report is approved by the local Environmental Protection Bureau who has assessed the risks and significance of impacts on Biodiversity due to land use and activities within its Area of Influence.

CRITERION	RATING	COMMENT
		<p>Based on the three assessment reports, there are no significant risks or impacts on Biodiversity associated with the Entity's products or production processes, or its location. There are no Priority Ecosystem Services identified.</p> <p>The Biodiversity Risk Assessment Report is available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3879">http://www.shalfoil.com/NewsDetail.aspx?ID=3879</a></p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified have been assessed and documented as low according to the approved EIA Report by the local environment protection agency. Furthermore, no Priority Ecosystem Services have been identified as a result of this assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified 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, and no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has established a Management Policy and procedures to prevent the introduction of invasive species. It has identified risks associated with the introduction of invasive species in its operations and logistical activities and assessed whether these activities would have significant adverse impacts on Biodiversity and Ecosystem Services. Based on the results of the Biodiversity assessment, the Entity's activities pose a low risk of introducing invasive species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has implemented and established a management manual that includes a commitment to not explore or develop New Projects or make Major Changes within World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has implemented and established a management manual with the commitment to protecting the environment. There are no Protected Areas in the Entity's Area of Influence as verified by the official list of Protected Areas in China.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. Human Rights</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Policy with the commitment to respect Human Rights including Gender Equity and has communicated it to all employees. The Energy, Environment, Society and Human Rights Policy is available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3875">http://www.shalfoil.com/NewsDetail.aspx?ID=3875</a></p> <p>The Entity has established and implemented a Human Rights Due Diligence process and mapped potentially Affected Populations and Organisations. The risks to Human Rights have been identified and assessed, and any major risks identified in the supply chain. The Entity's Supplier Code of Conduct is communicated to major suppliers. The associated mitigation and control measures are established and</p>

CRITERION	RATING	COMMENT
		<p>implemented, including audits for major suppliers. Supplier audit reports confirm no adverse cases were reported. The Human Rights Due Diligence Process is reviewed at the annual management review meeting.</p> <p>The Entity has identified populations and organisations potentially affected by its operational activities (including neighbouring businesses and employees around its plant locations), through the implementation of its compliance management and risk control procedures.</p> <p>No negative issues are found online regarding Human Rights issues related to the Entity and its Affected Populations and Organisations.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies with respect to the rights of women, and a programme to promote gender equity and women's empowerment in the whole employment process. There are no complaints received from women Workers. Women Workers interviewed during the Audit stated they know their rights, and no negative feedback was received. The Entity has assessed the Program on gender equity and women's empowerment, available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3873">http://www.shalfoil.com/NewsDetail.aspx?ID=3873</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, 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, 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, there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has implemented Policies and procedures to protect cultural and sacred heritage sites. However, there are no cultural and sacred heritage sites within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, there are no Indigenous Peoples 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 Indigenous Peoples within the Entity's Area of Influence and the Environmental Impact Assessment Report for the new extension did not require displacements.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity is committed to respecting the legal and customary rights and interests of Local Communities with regard to their lands, livelihoods and use of natural resources.</p> <p>The Entity has implemented compliance management and risk control procedures to identify, prevent, monitor and mitigate any</p>

CRITERION	RATING	COMMENT
		<p>significant impacts caused by its activities. These impacts may be related to Health and Safety, social and cultural Human Rights, or the environment.</p> <p>The Entity works closely with the Industrial Estate Management Committee and through its Stakeholder engagement process, consults with and involves Affected Populations and Organisations in developing its management plans. This includes public awareness campaigns on road safety, fire prevention and telecommunication fraud prevention, as well as initiatives including learning Lei Feng practices and values and youth volunteer services. In addition, the Entity also actively supports the local community by purchasing products that support local farmers.</p> <p>The Entity's primary impact on neighbouring populations and organisations arises from the environmental impact of its production activities, particularly the emission of air pollutants. To address this, the Entity has developed an environmental control plan in accordance with legal requirements and regularly reports on its implementation status to the Environmental Protection Agency. A map showing the Affected Populations and Organisations, along with the management plan, is available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3876">http://www.shalfoil.com/NewsDetail.aspx?ID=3876</a></p> <p>The response plan regarding impact on Environment, health and safety, social and cultural Human Rights is available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3885">http://www.shalfoil.com/NewsDetail.aspx?ID=3885</a></p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has established a Policy with a commitment not to use conflict minerals. They have implemented a Management System that includes supply chain mapping, risk assessment, control plans, Due Diligence audits, and reporting. The Entity also provides training courses to all relevant employees, communicates the Policy and requirements to suppliers, and requires suppliers to sign a Commitment Letter confirming their commitment to not using conflict minerals.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has conducted a supply chain risk assessment to determine if materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs), based on the results of the communication with suppliers. In accordance with the Risk Assessment Report, there are no materials currently sourced from the CAHRAs. All suppliers are located within China, and there are no critical Human Rights issues, such as Child or Forced Labour.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has defined the process to respond to risks in accordance with the 'OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas'. The risk assessment report has demonstrated there are no materials from the CAHRAs, with no red flags currently identified in the supply chain.</p> <p>The Entity maintains their business relationship with the material suppliers.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity's Due Diligence processes were included in this ASI Audit, which addresses this requirement.</p> <p>As part of the supplier due diligence process, the Entity has also identified their major next-tier suppliers, implemented supplier audit plans, and conducted second-party Due Diligence audits at major next-tier suppliers' sites, and requirements on CAHRAs form the audit</p>

CRITERION	RATING	COMMENT
		criteria. In accordance with the risk assessment record and supplier audit reports in 2024 and 2025, no materials are currently sourced from CAHRAs, the risk of conflict minerals is low, and no further action is needed.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The details and its result of supply chain Due Diligence on Conflict-Affected and High-Risk Areas for 2024 is publicly available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3891">http://www.shalfoil.com/NewsDetail.aspx?ID=3891</a>
9.9 Security practice	Conformance	Security guards are hired directly by the Entity. The Entity has implemented Policies and procedures addressing their commitment and approach to security activities that respect Human Rights, such as not permitting body searches. Training is provided to ensure all security Workers understand their responsibilities and how to demonstrate respect for Human Rights. There have been no complaints received on the Entity's security activities.
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 the Applicable Law in China and respects the Workers' rights to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	There are laws that restrict Freedom of Association and Collective Bargaining in China. However, the Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining. Workers' representatives can address Workers' concerns with management on their behalf.
10.2a Child Labour	Conformance	<p>In accordance with the roster, site observation and interviews with sampled Workers, the youngest worker in the Entity is 19 years old and commenced their employment in August 2024. No Child Labour is identified.</p> <p>In China, the minimum working age is 16. The Policy of not using Child Labour is established. The age of the candidate is verified by checking the ID cards, interview. Copies of ID cards of the Workers are kept in the personal files as evidence of age verification.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking. The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking.</p> <p>Workers are hired directly by the Entity, do not pay any fees to get the job, no deposit is required and no loans are provided. Workers retain their own identity documents. Freedom of movement is respected by the Entity and Workers can freely terminate the employment with appropriate prior notice.</p> <p>The Entity discloses its 2025 Modern Slavery Statement, available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3871">http://www.shalfoil.com/NewsDetail.aspx?ID=3871</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. The Entity's recruitment advertisements and training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than on personal characteristics. This was verified through Worker

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		interviews, who confirm they are treated equally in the Entity. There is equal pay for the same work. There are no cases of Discrimination received.
10.5 Communication and engagement	Conformance	The Entity has direct and frequent communication with Workers and the Worker representatives. The communication channels are communicated to Workers and Workers may raise concerns regarding working conditions, labour rights, OH&S issues and compensation issues, without the threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures are in compliance with legal requirements and require the confirmation of the involved Worker. The Entity does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence, including sexual Harassment, or verbal abuse of Workers. The Policy on Violence and Harassment is included in the Energy, Environment, Society and Human Rights Policy, available at: <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3875">http://www.shalfoil.com/NewsDetail.aspx?ID=3875</a>
10.7a-c Remuneration	Minor Non-Conformance	<p>The Entity's wage structure is clearly defined, and the basic wage meets the legal minimum wage. The total payment meets the Workers ' basic needs. All payments are documented and paid in a timely manner to all Workers by bank transfer close to, or on the 20<sup>th</sup> of the following month.</p> <p>It was identified however that Overtime wages for some workers are incorrectly calculated.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours are recorded manually. For most Workers (around 97%) at production workshops, there are four groups operating three shifts. Working Times are 08:00-16:00, 16:00-24:00, and 00:00-08:00. Shifts are switched every four days, and between this there is one rest day to ensure one day of rest every seven days is guaranteed. For other Workers and office staff, the Working Time is from 08:00 to 12:00 and 13:00 to 17:00. The regular Working Time is eight hours a day and 40 hours a week. The management procedure for working hours and Overtime work is established to control and manage Overtime.</p> <p>A sampling of the working hour records for October 2024, May 2025 and September 2025 confirmed that monthly Overtime hours do not exceed the legal limit. Most Workers are provided with at least one day off every seven days. The average workday does not exceed 8 hours in a six-month period.</p> <p>It was identified that a few Workers however do not receive one day off per seven days.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights as part of orientation training and provides them with an Employee handbook with information on their rights.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has established, implemented, and maintains an Occupational Health and Safety Management System (OHSMS) that is continually improved. The Entity holds a valid ISO 45001:2018 certificate, demonstrating their commitment to OH&S. Through on-site



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		<p>observations, document reviews, and interviews with management and Workers, it has been determined that the OHSMS is effective in preventing workplace hazards, promoting a safe and healthy working environment, and complying with relevant regulations and standards.</p> <p>It was identified that one operator however was not wearing hearing protection whilst working on-site.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity conducts periodic reviews of its OHSMS through monthly safety meetings, an annual evaluation of legal compliance, an annual internal audit based on ISO 45001:2018, and management review meetings. Should any indication of a control gap arise during these reviews, a thorough assessment is conducted to determine the necessity of implementing potential corrective and/or preventive actions. This proactive approach ensures that any identified issues or gaps in the OHSMS are promptly addressed.</p> <p>To promote transparency and disclosure of performance information, the achievement of the 2024 OH&amp;S Objectives and Targets, as well as comparative analyses of performance with peer businesses and leading practices, are available at:  <a href="http://www.shalfoil.com/NewsDetail.aspx?ID=3887">http://www.shalfoil.com/NewsDetail.aspx?ID=3887</a></p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity promotes OH&amp;S through a consultative system, encouraging Workers to raise concerns or suggestions either directly or via Management Representatives. A Health and Safety Committee has been established, conducting regular meetings with management to discuss OH&amp;S issues and plan improvements.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 January 2021	Initial Certification Audit
1	31 August 2022	Surveillance Audit and include the Entity's country location in the Certification Scope.
2	18 January 2024	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.
3	30 July 2024	Individual ASI Membership for Shangqiu Yangguang Aluminium Product Co., Ltd was superseded and the Entity has been included under the HENAN SUNHO COAL & POWER CO., LTD membership.
4	23 January 2026	Surveillance Audit and Scope Change from Performance Standard V3 to V3.1 and to remove 'Semi-Fabrication' and add 'Material Conversion' to Supply Chain Activities.