

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Shanxi Regal Advanced Material Co., Ltd.

CERTIFICATE NUMBER

538

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

DATE OF ISSUE

23 APRIL 2026

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

22 APRIL 2029

ASI ACCREDITED
AUDITING FIRM

TÜV RHEINLAND
CERT GMBH

CERTIFIED SINCE

23 APRIL 2026

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, 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

Aluminium alloy ingots and
Aluminium alloy extruded products
manufactured by Shanxi Regal
Advanced Material Co., Ltd. (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Shanxi Regal Advanced Material Co., Ltd.
ENTITY NAME	Shanxi Regal Advanced Material Co., Ltd.
CERTIFICATION SCOPE	Aluminium alloy ingots and Aluminium alloy extruded products manufactured by Shanxi Regal Advanced Material Co., Ltd. (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">8–9 January 2026
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">26 January 2026
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium ingots and extruded Aluminium products at Shanxi Regal Advanced Materials Co., Ltd. The main processes include re-melting, refining, casting, extruding, cutting and packing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

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

CERTIFICATION PERIOD 23 April 2026 – 22 April 2029

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 22 April 2027

CERTIFICATE NUMBER 538



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

Shanxi Regal Advanced Material Co., Ltd. operates two units dedicated to magnesium products and one to Aluminium. The units have independent production facilities and workforces and share the supporting facilities including the wastewater, gas and solid waste systems. The Shanxi Regal Advance Material Co., Ltd. Aluminium unit (the 'Entity') was established in 1998 and is located at Shangwang Village, Peishe Town, Yuncheng City, Shanxi Province, China.

The Entity has two 20 tonne re-melting lines, one 20 tonne horizon casting line, one 15 tonne continuous casting line, two 3 tonne continuous casting lines, three annealing lines, six extruding lines with packing areas, one 4,500 square metre (m²) warehouse for materials and finished goods and a 300 m² warehouse for solid waste.

The main production processes include remelting, refining, casting, heat treatment, extruding and packing, with a designed production capacity of 100,000 metric tonnes of Aluminium ingots and 10,000 metric tonnes of extruded Aluminium products. The auxiliary facilities included a gas station, office building, dormitory buildings, and a canteen.

The Entity has approximately 300 employees, and its key Stakeholders include shareholders, customers, partners and upstream suppliers and relevant government departments. There are no sensitive receptors such as residential areas, schools, rivers, nature reserves, or protected plants or animals within one kilometre of the Entity.

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	High	Medium	High	HIGH
RISKS	High	Medium	High	HIGH
PERFORMANCE	High	Medium	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to collect relevant Applicable Law. The Environmental, Health and Safety (EHS) and Management Departments are responsible for the review and assessment of relevant labour, ethics, Health and Safety and environmental laws at least quarterly.
1.2 Anti-Corruption	Conformance	<p>The Entity has established a business ethics procedure that addresses Extortion and Bribery, and training is provided for employees. The ethics reporting channel is addressed the Anti-Corruption and Anti-Bribery Procedure, available at: https://www.regal-metal.com/storage/uploads/20260210/436e20aa771d4c923aa8f24182d16a36.pdf</p> <p>The Entity has undertaken an investigation to determine the high-risk departments within the Entity, which includes Purchasing, Sales, Quality and Warehouse Departments. All staff in these departments must sign an Anti-Bribery/Anti-Corruption Commitment Letter.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct that addresses the principles relevant to the ASI Performance Standard and delivers training to Workers periodically. The Code of Conduct is included in the ASI Management Manual, available at: https://www.regal-metal.com/api/esg_info.html?type=3</p> <p>The Entity has communicated their Code of Conduct to their suppliers, which is acknowledge through signed commitment letter.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained a series of Policies consistent with environmental, social, and governance (ESG) practices. The Policies have been approved by the General Manager. Policies are reviewed annually as part of the management review process, upon any changes to the business that could affect ESG risks, or any indication of a control gap. The Policies are communicated internally through orientation, training, and displays, and are available at: https://www.regal-metal.com/storage/uploads/20260210/384a1fae623f201d1dc7b5566ddf5e66.pdf
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative with overall responsibility and authority to ensure Compliance with the ASI Performance Standard. The authority and responsibilities of this role are defined in the appointment letter. An ASI Team has also been established to support the implementation of the Entity's ASI Performance Standard Management System.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System, which is certified to ISO 14001:2015. The latest surveillance audit was conducted in June 2025, and relevant reports were reviewed and no non-conformances were identified.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System and complies with legal requirements. An annual compliance evaluation is conducted, with no fines or corrective actions requests from government agencies and other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity is committed to responsible sourcing, which is implemented through supplier assessments, supplier-signed commitment letters, and emphasising to suppliers the implementation of the ASI Performance Standard. The Entity's Responsible Sourcing Policy is available at: https://www.regal-metal.com/storage/uploads/20260210/5a0156f526a2cf739f85658ff626cda3.pdf</p> <p>The Entity has conducted Due Diligence investigations on all suppliers through supplier assessment, covering ESG topics, and identifies improvement opportunities.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to its existing Facility. However, the Entity evaluated the environmental, social, cultural and Human Rights impacts as part of the Environmental Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to its existing Facility. However, the Entity has established a Human Rights Impact Assessment process and the Human Rights Impact Report is available at: https://www.regal-metal.com/storage/uploads/20260210/005f39310862d9da360e4160d7074977.pdf
2.7a-f Emergency Response Plan	Conformance	<p>In collaboration with potentially affected Stakeholder groups, the Emergency Response Plans have been established and implemented. Training is provided periodically. The Emergency Response Plans are available at:</p> <p>https://www.regal-metal.com/storage/uploads/20260210/d81b932ff8e7b6f3714534c80fb5a54e.pdf</p> <p>https://www.regal-metal.com/storage/uploads/20260210/a6381247009c6fe92bfb313344c0376a.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Continuity and Resumption Plan that addresses significant adverse ESG impacts. Additionally, it has developed the ASI Management Manual, which mandates regular reviews of the Plan during the annual management meeting, upon substantial changes to the Business or the identification of control gaps.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Merger and Acquisitions Control Procedure, which includes a Due Diligence process. No merger or acquisition activity has occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Closure, Decommissioning and Divestment Control Procedure. No such activity has occurred in the past three years.

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed and published a 2024 Sustainability Report, which addresses governance, environment and social topics. The Entity's Sustainability Report is available at: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity did not incur any significant fines, judgments, penalties, or non-monetary sanctions for non-compliance with Applicable Law. This information is included in 2024 Sustainability Report, available at: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p> <p>There were no fines or other non-compliance issues in the past three years.</p>
3.3a-c Payments to Governments	Conformance	The Entity has disclosed its payments to Governments in its annual reporting, including the 2024 financial Audit Report, issued by a qualified Third Party, available at: https://www.regal-metal.com/api/esg_info.html?type=3
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented the ASI Performance Standard Management System, which tracks requests and complaints from Stakeholders and has an appropriate Complaints Resolution Mechanism. The communication channels (telephone/email) are public to internal and external Stakeholders and are available in the 2024 Sustainability Report: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has established processes and systems to conduct Life Cycle Assessments (LCA). The LCA report for Aluminium ingots was completed in September 2025 and addresses all Material inputs and all outputs of environmental impacts, including air emissions, Greenhouse Gas (GHG) emissions, wastewater and solid waste.</p> <p>The Entity's extrusion lines commenced operation toward the end of 2023, however, production in 2024 was unstable. Consequently, the Entity lacks sufficient data to generate the LCA for extrusion Products. According to the internal plan, the LCA for these Products is expected in 2026, based on 2025 reference data.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has implemented the ASI Management Manual, which defines that the Entity will make LCA reports publicly available with adequate information covering system boundaries and underlying assumptions. The latest LCA Report is available at: https://www.regal-metal.com/storage/uploads/20260210/fa78008c46df8fba4d5910fa220d5a53.pdf</p> <p>The LCA data, with the exception of the Greenhouse Gas (GHG) emissions data, have not been obtained from suppliers and therefore only include a 'gate-to-gate' methodology.</p>

CRITERION	RATING	COMMENT
4.2 Product Design	Minor Non-Conformance	<p>The Entity has implemented the Design Management Procedure, which specifies that during the Product design process, resource utilisation efficiency, optimisation of usage stages, recycling and waste tolerance should be given priority. Detailed sustainability objectives, including GHG density in relation to the LCA, have been established for current Products.</p> <p>Key information such as verification data pertaining to the sustainability objectives for GHG emissions is not documented in the Product design records.</p>
4.3a-b Aluminium Process Scrap	Conformance	The Entity's Aluminium Process Scrap is recycled internally. The Entity has established a Scrap inventory to track the data. The Entity clearly separates Scrap by alloy grades and labels are posted for different Scrap during its collection and storage.
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 engaged with local recycling units such as the 'Shanxi Province Strategic Alliance for Technological Innovation in the Recycled Aluminium Industry' to contribute to efforts to increase recycling rates. The Entity is a member of the council.

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity engages a certified Third Party to verify its Greenhouse Gas (GHG) emissions annually. The 2024 GHG Verification Statement indicates the Entity generated a total of 1,832,404 tonnes of CO₂e in 2024, which included all Material sources of Scope 1, 2 and 3 emissions. Approximately 85% of the total emissions are Scope 3 emissions. The 2024 GHG Verification Statement is available at: https://www.regal-metal.com/storage/uploads/20260210/eca847a5e2828a3db188adfa2015171f.pdf</p> <p>The Entity's 2024 GHG Inventory Report is available at: https://www.regal-metal.com/storage/uploads/20260210/67184a117591de4ae3c53728103a77a4.pdf</p> <p>However, approximately 50% of the emissions factors for raw materials were based on the regional average values from the 'Ecoinvent' database for China, which doesn't reflect the current situation and reduces the confidence level of Scope 3 GHG emissions data. Additionally, the Entity's Scrap Aluminium is not clearly accounted for in the GHG Inventory Report.</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 –	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	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and set Intermediate Targets aligned with the GHG Emissions Reduction Pathway, determined using the ASI GHG Pathways Calculation Tool.</p> <p>The Entity has used a 2023 baseline to establish a 2030 target for Aluminium alloy products of 0.71 t CO₂e/t Al for Scope 1 and 2, and 6.82 t CO₂e/t Al for Scope 3 emissions. The 2030 target for extruded Aluminium products is 1 t CO₂e/t Al for Scope 1 and 2, and 12.59 t CO₂e/t Al for Scope 3 emissions.</p> <p>However, using 2023 as the baseline year for extruded Aluminium products when determining the GHG reduction targets is not suitable, as the extrusion lines were still in a pilot stage during 2023.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity accounts GHG emissions by source, including energy and material purchasing, on a monthly basis and conducts annual review of its GHG Emissions Reduction Plan to assess its effectiveness. Intermediate Targets have been established. The GHG Emissions Reduction Pathways have been published in the GHG Emissions Reduction Plan, available at: https://www.regal-metal.com/storage/uploads/20260210/aff192e07fbe7c98ff2e3f13330f2095.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has documented GHG emissions Policies, reduction objectives, data tracking tools and review requirements. The Entity has established GHG Emissions Reduction Pathways using the tools provided by ASI, and executable projects have been developed, such as increasing the sourcing of Aluminium ingots produced using 'green' electricity (Scope 3) and establishing a residual heat recycling system (Scope 2). An annual management review process is implemented to ensure the projects remain on track.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity's main air pollutants include sulphur dioxide, nitrogen oxide, particulate matter, fluoride, hydrogen chloride, and others. The Entity has installed a waste air treatment system to ensure Compliance with discharge regulations. The waste air treatment system is maintained in good condition.</p> <p>The Entity has installed an online monitoring system for key pollutants and other pollutants are monitored by a certified third party semi-annually. No exceedances have been detected in past years. Emissions to Air are disclosed in the Summary of Air Pollutant Emissions and Emission Reduction Plans from Major Emission Outlets: https://www.regal-metal.com/storage/uploads/20260210/8d0bfac607d0e036de32f9505c98cb85.pdf</p> <p>The Entity has established reduction targets and improvement plans for air pollutants and monitors progress against the reduction objectives annually. The 2025 Waste Gas, Wastewater and Energy Emissions Reduction Plan is available at: https://www.regal-metal.com/storage/uploads/20260210/5a48906d7937740f276c48cb4d083efa.pdf</p>

CRITERION	RATING	COMMENT
		However, there is no air purification device in the Hazardous Waste warehouse where Aluminium Dross is stored and generates ammonia gas.
6.2a-g Discharges to Water	Conformance	The main industrial wastewater is produced by the cooling system for casting. Both industrial and domestic wastewater are internally recycled and there is no external discharge. The Entity presents the annual wastewater information in the 2025 Waste Gas, Wastewater and Energy Emissions Reduction Plan, available at: https://www.regal-metal.com/storage/uploads/20260210/5a48906d7937740f276c48cb4d083efa.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established a Leakage Management Procedure that defines the process for managing Spills and Leakages. The Entity conducts annual risk assessments, or whenever there is a Material change. No significant risk has been identified. The Entity has established monthly, quarterly, and annual monitoring plans to assess the competence of devices for waste air, wastewater, Liquid Aluminium, and chemicals. Relevant reports are retained for review, and no Leakage or spillage has occurred in the past year. Information on Spills and Leakage data and preventive actions are included in the 2024 Sustainability Report, page 37: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's emergency response control process defines the procedures for managing and reporting Spills and Leakages. No spill or leakage incidents have been reported in previous years. The Leakage Management Procedure specifies that Spill incidents will be published in the Sustainability Report. Further information is included 2024 Sustainability Report, page 37: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity's solid Waste is transferred to vendors who hold legal permits for the disposal. The Entity conducts an annual risk assessment for the management of solid Waste and no significant risks to human well-being or the environment were identified. The Entity has established improvement objectives and plans to reduce the quantity of solid Waste generated, which are reviewed annually. The Entity has published information on solid waste, including category, quantity, and disposal method, in the 2024 Sustainability Report, page 36-37: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.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	Conformance	All Aluminium Dross and residues are recycled using internal equipment and the final Dross is treated as Hazardous Waste in accordance with legal requirements. According to investigation reports, vendors utilise the Dross for Aluminium recycling, and the final

CRITERION	RATING	COMMENT
		treated Dross residues are used in the manufacture of other products, there is no landfilling.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity regularly undertakes water mapping. Risk assessments are conducted annually, and no high risks have been identified. Information on water withdrawal, usage and the risk assessment results in the Water Resources Risk Assessment, available at: https://www.regal-metal.com/storage/uploads/20260210/323ee3f2279fcb73521461ab5360edc0.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment did not identify any high risks.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has addressed Biodiversity and Ecosystem Services as part of the Environmental Impact Assessment (EIA), which was carried out by a qualified Third Party and approved by the local environmental bureau. The assessment results indicate that the impacts on Biodiversity and Ecosystem Services are low. The Entity annually reviews the environmental conditions related to Biodiversity and Ecosystem Services against the EIA report, with no changes observed since commencement.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the assessment determined that the risks and impacts on Biodiversity and Ecosystem Services are low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the assessment determined that the risks and impacts on Biodiversity and Ecosystem Services are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the assessment determined that the risks and impacts on Biodiversity and Ecosystem Services are low, and no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has established a Policy to prevent the introduction of Alien Species and conducted a risk assessment for the Entity's activities (package material purchasing, transporting, afforesting) regarding the introduction of Alien Species. The assessment identified no Material risk of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located within a World Heritage Property. The Entity's ASI Management Manual defines that the Entity must conduct an annual management review of its 'No Go' in World Heritage Properties Policy.
8.6a-d Protected Areas	Conformance	The Entity has addressed Protected Areas as part of the EIA, which was carried out by a qualified third party and received approval from the local environmental bureau. The assessment determined that there are no Protected Areas within the Entity's Area of Influence. The Entity

CRITERION	RATING	COMMENT
		<p>annually reviews the Protected Areas regulated by national and local governments. Further information is available in the Biodiversity Risk Assessment Report: https://www.regal-metal.com/storage/uploads/20260210/2b61b23de4c52aed85eccb0679d7b541.pdf</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a gender-responsive Code of Conduct to respect Human Rights, promote gender equality and comply with the UN Guiding Principles on Business and Human Rights. The Code of Conduct is available at: https://www.regal-metal.com/api/esg_info.html?type=3&page=3</p> <p>The Entity has established a procedure to conduct Human Rights Due Diligence. Implementation of the Human Rights Policy and relevant performance are reviewed. The Human Rights Impact Assessment report and information on the affected Communities' engagement approach and the Complaints Resolution Mechanism are available at: https://www.regal-metal.com/storage/uploads/20260210/005f39310862d9da360e4160d7074977.pdf</p> <p>The Entity has identified the Affected Populations and Organisations and complaints and grievances channels are public to all Stakeholders. Relevant information is available in 2024 Sustainability Report, available at: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p> <p>No significant adverse Human Rights impacts are caused by or contributed to by the Entity's operation. The Entity commits to provide for or cooperate in remediation through legitimate processes if there is a negative impact on Human Rights identified or reported.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a commitment in the Code of Conduct to protect female Workers and respect and promote gender equity and women's empowerment. The Entity has developed activities to support work-life balance especially for women. The Entity has publicly disclosed information on the gender equity Policy and performance on the protection of female Workers in the 2024 Sustainability Report: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p> <p>Female Workers receive equal remuneration to with male Workers, each department, the management team and the Board includes female representation and no Discrimination is noted. Measures taken to promote gender equality are established and implemented, and reported, available at: https://www.regal-metal.com/storage/uploads/20260210/629c9e831cceeaf15ab4e71eb28bc06.pdf</p>

CRITERION	RATING	COMMENT
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 and implemented a procedure to identify cultural and sacred heritage and conduct risk assessments. Environmental and Social Impact Assessments have been undertaken for all the Entity's projects and it has been determined that there are no sacred or cultural heritage sites or values within its 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 within its Area of Influence, nor are there any Indigenous Peoples or their lands, territories, and resources identified.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Changes or New Projects that required resettlement in the history of the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed a Policy to respect the legal and customary rights and interests of Local Communities regarding their lands, livelihoods, and use of natural resources. This Policy underscores the Entity's commitment to ethical practices and sustainable development. The Entity is located within an industrial zone, with no nearby communities, thereby ensuring minimal impact on local populations. However, the Entity does actively support local livelihoods by employing local people and contributing to economic stability and development in the region.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established and implemented a Policy that commits to not sourcing conflict minerals. To support this commitment, the Entity has developed a comprehensive management system that includes supply chain mapping, risk assessment, control plans, Due Diligence audits, and reporting mechanisms to ensure compliance throughout its operations and supply chain. Relevant employees receive training in the Policy and its requirements. Additionally, the Policy is communicated to suppliers, who are required to sign a commitment letter affirming their agreement to avoid and not support the use of conflict minerals.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has identified and assessed the risks in its supply chain through regular risk assessment. No conflict minerals are used, no materials are from Conflict-Affected and High-Risk Areas (CAHRAs),

CRITERION	RATING	COMMENT
		and there are no critical Human Rights issues such as Child Labour and Forced Labor.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	The Criterion is not applicable to the Entity, as the supply chain Due Diligence and risk assessment report determined that no materials are sourced from CAHRAs and no Material or potential risks have been identified in the supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	As part of supplier Due Diligence process, the Entity has identified the major next tier suppliers, established a supplier audit plan and conducted second party Due Diligence Audits at major next tier suppliers' sites. The Entity's Due Diligence practices were audited as part of this ASI Audit, which fully meets the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established and implemented a supplier management procedure, undertaken risk assessments and conducted social responsibility audits on its supply chain. The Entity has disclosed information on its supplier management practices in the 2024 Sustainability Report, pages 18-19: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf
9.9 Security practice	Conformance	The Entity has implemented a management procedure to ensure respect for Human Rights in its security activities. Security guards are stationed at entrance gates for visitor management only, with no body searches or restrictions on Workers' movement allowed. Security personnel receive appropriate training, and Worker interviews confirmed their understanding of security tasks and commitment to respecting Human Rights. No grievances or complaints have been reported regarding 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 they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union and all Workers are members. The Labour Union Constitution outlines the Union representative election process and member's rights.
10.2a-c Child Labour	Conformance	The Entity has adequate and effective processes to ensure there is no Child Labour at the Entity, and a remediation plan is established. No evidence of Child Labour was found and the youngest Worker was 19 years of age. The Entity has implemented clear control measures for prohibiting the use or support of Child Labour. It verifies candidates' ages through identity card checks, interviews, and retains copies of identity cards as proof of age verification.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity has established a Policy prohibiting Forced Labour and Human Trafficking. The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking. No case of illegal wage deductions, Debt Bondage,

CRITERION	RATING	COMMENT
		<p>payment for a debt or other type of Forced Labour has been identified nor reported.</p> <p>The Entity has established and implemented a Modern Slavery Statement, however, it is not publicly disclosed.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established a commitment to non-Discrimination. Recruitment advertisements, training and promotion opportunities, and termination records indicate decisions are based solely on the candidate's job performance, not personal characteristics. Payment records reflect equal pay for equal work. Workers interviewed confirm that they feel treated equally and no Discrimination case has been reported. The Entity has disclosed its performance in the 2024 Sustainability Report, available at: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established mechanisms for direct and frequent communication with Workers and Worker representatives in the Workers' Council. Interviewed Workers confirmed a positive working atmosphere with direct communication. Workers can report their concerns through various channels, such as a suggestion box, email, hotline, including an anonymous channel, and 'whistleblowers' are protected from retaliation, intimidation, and Harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented Policies stating that Harassment or bullying is not accepted. An information brochure has been developed and distributed to all employees. The Violence and Harassment Policy is disclosed in the 2024 Sustainability Report, available at: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p>
10.7a-c Remuneration	Conformance	<p>The Entity has a clearly defined wage structure, ensuring that the basic wage exceeds the legal minimum wage and that the total payment is sufficient to meet Workers' basic needs. Wage payments are documented and made in a timely manner via bank transfer on the 20th day of the following month. Payslips provide detailed information regarding wages, allowances, Overtime compensation, and deductions.</p>
10.8a-c Working Time	Conformance	<p>The Entity ensures strict Compliance with labour standards through detailed documentation of working hours. Workshop employees adhere to a shift system of four groups with three shifts, while office staff work five days per week. Working hours are monitored and the daily/monthly Overtime hours do not exceed the legal daily/monthly limit, and all Workers have at least one day off per seven-day period. This arrangement ensures employees receive at least one day off every seven days and maintain an average of eight working hours or less per day over the past six months.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity ensures that Workers are informed of their rights through orientation training sessions, regular training programs, bulletin board notices, and the Employee Handbook. This approach assists Workers understand their rights and responsibilities in the workplace.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, and maintains an Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001:2018. Based on on-site observations, document reviews, and interviews with management and Workers, the OH&S Management System is deemed effective in preventing workplace hazards, promoting a safe and healthy working environment, and complying with relevant regulations and standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity conducts management reviews of the OH&S Management System annually, or when there is a Material change in risk level or a control gap. The Entity annually reviews OH&S performance data, including injury and training indicators and discloses data in the 2024 Sustainability Report, pages 53-58: https://www.regal-metal.com/storage/uploads/20260210/2934ce9b6174eb896e8f2d82d4587ba8.pdf</p> <p>The Entity analyses Health and Safety Key Performance Indicators (KPIs) with peer Businesses and leading practices annually during management review. The analysis is not, however, publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an OH&S Management Committee to oversee workplace safety standards and drive continuous improvement in OH&S practices. Regular meetings are held to assess conditions and develop strategies for enhancement. To promote employee engagement, the Entity has implemented communication channels including suggestion boxes and Worker representative assemblies, allowing employees to report concerns and collaboratively address OH&S issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	23 April 2026	Initial Certification Audit – Full Certification