

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Yunnan Sunho Aluminum Co., Ltd

CERTIFICATE NUMBER
264

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
CHINA QUALITY MARK
CERTIFICATION GROUP

DATE OF ISSUE
2 MARCH 2026

DATE OF EXPIRY
1 MARCH 2029

CERTIFIED SINCE
2 MARCH 2023

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

Yunnan Sunho Aluminum Co., Ltd.
located in Wenshan City, Yunnan
Province (China) with main
production of hydropower
Aluminium.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	YUNNAN SUNHO ALUMINUM CO., LTD
CERTIFICATION SCOPE	Yunnan Sunho Aluminum Co., Ltd. located in Wenshan City, Yunnan Province (China) with main production of hydropower Aluminium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 27 October 2022)Surveillance Audit (6 – 7 November 2023)Surveillance Audit (17 – 18 February 2025)Re-Certification Audit and Scope Change (15 – 19 December 2025)
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">24 – 27 October 2022 (Initial Certification Audit)6 – 7 November 2023 (Surveillance Audit)17 – 18 February 2025 (Surveillance Audit)15 – 19 December 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 December 2022 (Initial Certification Audit)23 November 2023 (Surveillance Audit)28 February 2025 (Surveillance Audit)30 December 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 27 October 2022)</u></p> <p>The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. Facility located in Wenshan City, Yunnan Province (China) with the main production of hydropower Aluminium.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (6 – 7 November 2023)</u></p> <p>The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. Facility located in Wenshan City, Yunnan Province (China) with the main production of Aluminium.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Smelting

- Casthouses

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

Surveillance Audit (17 – 18 February 2025)

The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. Facility located in Wenshan City, Yunnan Province (China) with the main production of hydropower Aluminium.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

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

Re-Certification Audit and Scope Change (15 – 19 December 2025)

The Audit Scope included the Yunnan Sunho Aluminum Co., Ltd. Facility located in Wenshan City, Yunnan Province (China) with the main production of hydropower Aluminium.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

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

AUDIT OUTCOME

- 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

2 March 2026 – 1 March 2029

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

1 September 2027

CERTIFICATE NUMBER

264



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

Yunnan Sunho Aluminum Co., Ltd. (the 'Entity') is located at No. 1, Green Hydroelectric Aluminum Demonstration Park, Banlun Township, Funing County, Wenshan City, Yunnan Province, China. The Entity primarily produces hydroelectric Aluminium Products, including liquid Aluminium and Aluminium ingots for remelting. Its Products are mainly supplied to downstream Aluminium processing enterprises.

The Entity has a designed annual production capacity of 900,000 tonnes of Aluminium. In 2024, total production amounted to approximately 840,000 tonnes, of which liquid Aluminium represented 35% and remelted Aluminium ingots represented 65%. As of 2025, liquid Aluminium production accounted for approximately 62% of total output. The proportion of renewable power used in production is approximately 87.9%.

Major production equipment includes 658 units of 500 kA electrolytic cells, five electric heating mixing furnaces, 10 medium-frequency induction melting furnaces, 14 rectifier transformers, 24 units of 32-tonne multifunctional metallurgical vehicles, and seven centrifugal air compressors.

The Entity's Facilities include office buildings, employee dormitories, cafeterias, warehouses, parking areas, activity centres, bathhouses, water production rooms, air compressor stations, sewage treatment ponds, gas stations, electrolytic flue gas purification systems, material storage and transportation systems, substations, and rectification Facilities.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	In accordance with its Legal and Customer Requirements Identification and Evaluation Management Procedure and the Compliance Evaluation Control Procedure, the Entity has assessed the applicability of relevant legal and regulatory requirements and demonstrated Compliance.
1.2 Anti-Corruption	Conformance	In accordance with its Anti-Bribery Management Procedures, the Entity has established an anti-Bribery Policy, an anti-Bribery management team, and a risk assessment group. It performs annual reviews to assess the implementation and effectiveness of anti-Bribery controls.
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct covering Environmental, Social, and Governance (ESG) principles, which are continuously implemented. The Entity has also developed and publicly disclosed its Code of Conduct, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1345</p> <p>The Entity conducts regular reviews of its Code of Conduct through annual internal audits and management reviews. The Code of Conduct is reviewed at least every five years and whenever significant changes occur that could materially affect ESG risks, or when indications of control deficiencies are identified.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established Environmental, Social, and Governance (ESG) Policies within its ASI Management Manual and maintains documented information relating to environmental management, Occupational Health and Safety (OH&S), ASI requirements, and social governance.</p> <p>The General Manager has approved, issued, and demonstrated support for the Entity's ESG Policies. The suitability and effectiveness of these Policies are reviewed annually through management review activities. The ASI Management Manual further requires Policy reviews whenever Material changes occur that could significantly affect ESG risks or when indications of control deficiencies are identified.</p> <p>The Entity's Management System requires Policies to be reviewed and updated in a timely manner in response to relevant changes. The Entity has not experienced any Material changes that would significantly affect its ESG risks.</p> <p>The Entity communicates its ESG Policies internally through document training, awareness activities, and workplace displays. Externally, the Policies are communicated through corporate communications and sustainability-related materials and are publicly disclosed on the Entity's website, including within its Sustainability Report, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1422</p>
2.2a-c Leadership	Conformance	The Entity has appointed a senior manager as the ASI Management Representative, with roles and responsibilities defined in a formal letter of appointment. The Entity's ASI Management Representative is

CRITERION	RATING	COMMENT
		<p>responsible for leading the implementation of the Entity's Policies and ensuring Compliance with applicable ASI Standard requirements.</p> <p>The ASI Management Representative is also responsible for overseeing the internal and external communication of the Entity's Policies and promoting awareness of ASI requirements among relevant Stakeholders.</p> <p>The ASI Management Representative is authorised to direct and mobilise the necessary human, social, environmental, and other resources required to establish, implement, maintain, and continually improve a Management System that conforms to ASI Performance Standard requirements.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity maintains a valid Environmental Management System certification, the scope of which encompasses the Entity's ASI Certification Scope.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management System that includes components relating to Human Rights and labour rights within the ASI Management Manual, supporting the implementation and management of the Social Management System.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity's Supplier (Contractor and Service Provider) Implementation of ASI Management Procedures has been implemented and is maintained. These procedures cover ESG requirements. Responsible procurement principles are integrated and applied across all relevant levels of the Entity.</p> <p>The Entity has publicly disclosed its latest Responsible Sourcing Policy, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1350</p> <p>The Entity conducts annual supplier re-evaluations, with assessments, agreements, and contracts generally including requirements related to suppliers' social responsibility, Human Rights, sustainability, Due Diligence, and implementation of the ASI Responsible Sourcing Policy, supported by sustainability questionnaires.</p> <p>The Entity's ASI Management Manual requires the Responsible Sourcing Policies to be reviewed at least every five years and in a timely manner whenever organisational changes occur that could significantly affect ESG risks or when indications of control deficiencies are identified. The Entity has not experienced any Material changes in ESG risks or identified any control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes.
2.7a-f Emergency Response Plan	Conformance	The Entity's Environmental Management System and Occupational Health and Safety (OH&S) Management System Certifications remain valid. The Entity's ASI Management Manual defines requirements for emergency preparedness and response. The Entity has established an Emergency Preparedness and Response Control Procedure and

CRITERION	RATING	COMMENT
		<p>implemented emergency drill plans covering environmental, social, and safety contingencies.</p> <p>Emergency procedures are periodically tested through drills to assess the suitability of contingency plans. The effectiveness of emergency response arrangements is also evaluated through annual internal audits and management reviews. In the event of an emergency, the implementation of contingency plans is reviewed and revised where necessary.</p> <p>The Entity's ASI Management Manual also requires that emergency response plans are reviewed whenever organisational changes alter the nature or scale of emergency risks, or when indications of control deficiencies are identified. The Entity has not identified any control deficiencies in its processes. The Emergency Preparedness and Response Control Procedure and related training records are maintained, and the emergency plan is reviewed annually, with identified issues addressed through revision and testing to ensure continued Compliance.</p> <p>The Entity has also publicly disclosed its 2025 Annual Specialised Emergency Response Plan Drill Schedule for Environmental and Production Safety Incidents, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1425</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a Business Continuity Plan and Disaster Recovery Plan Management Procedure to address production disruptions or transitions caused by Force Majeure, incorporating measures to mitigate significant adverse impacts related to ESG factors. The procedure includes requirements for review at least once every five years by the relevant departments, as well as 'ad hoc' reviews whenever organisational changes occur that could significantly alter ESG risks or when indications of control deficiencies are identified.</p> <p>The Business Operations Department and Administration and Personnel Department are responsible for periodic reviews of the suspension, resumption, and Business interruption management procedures in accordance with the documented requirements.</p> <p>To date, no organisational changes affecting ESG risk levels have occurred at the Entity, and no control deficiencies have been identified that would necessitate a review outside the scheduled cycle.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established Merger and Acquisition Management Procedures covering pre-implementation preparations, potential risks, and risk mitigation during transactions. ESG factors are incorporated as key considerations in merger and acquisition decisions. No mergers or acquisitions have occurred since the implementation of the Entity's ASI management framework.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established procedures for the management of closure, decommissioning, and divestment. These procedures support the allocation of necessary resources and provide for coordination with local authorities and communities to manage associated impacts, including site rehabilitation. To date, the Entity has not undertaken any closure, decommissioning, or divestment activities.</p>

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		The Entity is wholly owned by Henan Shenhua Coal and Power Co., Ltd., with funding arrangements coordinated at the parent Group level, while the Entity is responsible for operational management. The Entity has also established procedures to address environmental and social issues arising from, or associated with, closure, decommissioning, and divestment activities.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has defined sustainability reporting requirements within its ASI Management Manual and has established and implemented relevant Policies, systems, and procedures to ensure Compliance with sustainability reporting obligations. The Entity has prepared and disclosed its 2024 Sustainability Report, available at: http://www.shenhua.com/home/content/content/?categoryId=19&articleId=1422
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has established management procedures governing the disclosure of information related to non-Compliance and liability and has defined relevant requirements within the ASI Management Manual. Instances of non-Compliance are used to assess the effectiveness of management in ensuring operations comply with applicable governance, environmental, and social laws and regulations.</p> <p>During the reporting period, the Entity did not receive any fines, judgments, penalties, or non-monetary sanctions due to breaches of applicable laws. The relevant information is available in the Entity's Sustainability Report at: http://www.shenhua.com/home/content/content/?categoryId=19&articleId=1422</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity prescribes the requirements for payments to government (legal and contractual) within the ASI Management Manual and has established and implemented Policies, systems, procedures, and processes in accordance with anti-Corruption requirements, supported by the Transparency and Anti-Corruption Policy.</p> <p>The Entity ensures that all payments to government are facilitated in accordance with applicable legal provisions and contractual obligations. Financial records are maintained for each payment, and regular financial audits are conducted to verify the legitimacy and accuracy of disbursements. The relevant information is also disclosed in the Entity's Sustainability Report, available at: http://www.shenhua.com/home/content/content/?categoryId=19&articleId=1422</p> <p>The Entity pays applicable taxes in accordance with tax legislation, including value-added tax, urban maintenance and construction tax, education surcharge, local education surcharge, environmental protection tax, land use tax, stamp duty, corporate income tax, property tax, and individual income tax withholding. All tax payments are made in Compliance with applicable National laws and regulations.</p> <p>The Entity also discloses, directly or through intermediaries, the value and beneficiaries of financial and in-kind political contributions in its Sustainability Report.</p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established an accessible, transparent, understandable, and culturally and gender-sensitive Grievance Mechanism. Interested parties may submit complaints, appeals, and information requests via the Entity's official social media account, the factory entrance notice board, or the published telephone number and email address. No adverse cases have been identified to date.</p> <p>The Entity has also disclosed its Stakeholder grievance channels, including complaint hotlines and email addresses, as part of its Complaints Resolution Mechanism, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1354</p> <p>The Entity has established documented procedures, including the Consultation, Communication and Information Exchange Control Procedure and the Information Liaison Processing Form, which are implemented and maintained. The Complaints Resolution Mechanism is required to be reviewed at least once every five years, whilst procedural documentation is also reviewed annually through internal audits and management review activities.</p> <p>The ASI Management Manual further requires that the Complaints Resolution Mechanism be reviewed whenever organisational changes result in Material impacts on ESG risks, or when potential indications of control deficiencies are identified. To date, no significant organisational changes have occurred, and no control deficiencies have been identified.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Lifecycle Assessment (LCA) of its major Product (Aluminium ingots) and completed a third-party verification in accordance with ISO 14044:2006.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity has developed its LCA report, which is typically provided to clients upon request as a contractual appendix and is available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1522</p> <p>The Entity has assessed the life cycle impacts of its main Product (Aluminium ingots) and completed a third-party verification.</p> <p>For purchased Alumina, however, the emission factors are sourced from an inappropriate database category rather than supplier-specific data and do not reflect the Entity's actual conditions.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established targets for Process Scrap, which have been communicated to each production process and are monitored monthly. These targets are predominantly being achieved.</p> <p>The Entity's processes and Product types do not require the separation of Aluminium Process Scrap for recycling or reuse. Documentation requirements indicate that 100% of Process Scrap generated is recycled.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity prioritises direct communication with Product users regarding the economic, environmental, and social benefits of Aluminium collection and recycling.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity prescribes requirements for disclosing Greenhouse Gas (GHG) emissions and energy usage in its ASI Management Manual. The Entity has published the 2024 Annual Greenhouse Gas Emissions Verification Report, which includes details on raw material and energy consumption, available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1523</p> <p>For purchased Alumina, emission factors have been inappropriately applied by the Entity rather than being sourced from primary data, which is inadequate to accurately and representatively reflect the Entity's actual conditions.</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	Conformance	The Entity's third-party Greenhouse Gas emissions reports indicate that the Greenhouse Gas emission intensities over the past three years (2022, 2023, and 2024) are consistently below 11.0 t CO ₂ e/t Al, meeting the average emission intensity requirement prescribed by the ASI Performance Standard.
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has developed its Greenhouse Gas Emissions Targets and Implementation Plan, using the ASI Greenhouse Gas Decarbonisation Pathway Tool to define an emissions reduction pathway aligned with the 1.5°C warming scenario, available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1524</p> <p>The Entity, however, does not include adequate GHG decarbonisation pathways, and there is an inconsistency between the chart and the corresponding description.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The Entity has developed its Greenhouse Gas Emissions Targets and Implementation Plan, using the ASI Greenhouse Gas Decarbonisation Pathway Tool to define an emissions reduction pathway aligned with the 1.5°C warming scenario, including Intermediate Targets, available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1524</p> <p>The Entity's GHG reduction measures include energy-saving initiatives; however, the targets and measures related to low-carbon procurement remain insufficient.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has established and implemented a review and management plan to control the GHG reduction programme and verify whether actual reduction performance meets the defined targets.</p> <p>The adequacy of the Entity's Management System, however is considered insufficient.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's discharge permit specifies the names of discharge outlets, types of pollutants, and permitted emission concentration limits. The Entity conducts regular monitoring of air emissions as required, and all discharges currently comply with local statutory standards. It has also established an air pollutant reduction programme, which is reviewed and disclosed annually, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1347</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity's production wastewater is treated at a sewage treatment plant and recycled without any external discharge. Domestic sewage is treated for reuse, with annual monitoring results consistently meeting requirements. The Entity has established a Corporate Water Pollutant Reduction Plan, which is reviewed annually and updated in the event of significant changes or non-Compliance, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1359</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed and implemented an Emergency Response Plan for Environmental Emergencies, subject to review every three years. Where Spill or Leakage risks may occur during operations, the Plan is implemented according to risk classification for different risk types. No Spill or Leakage incidents have occurred.</p> <p>The relevant information is disclosed annually in the Entity's Sustainability Report under Section VI, and the Entity's Spills and Leakages Management Plan is available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1428</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established and implemented an Emergency Response Plan for environmental incidents, which defines requirements for notifying relevant Stakeholders, including the local community, neighbouring residents, and local government, in the event of Spills or Leakages. The Entity conducts monthly environmental inspections, which include checks of potential Spill and Leakage points. The most recent inspection in January 2025 addressed high-risk areas including Hazardous Waste temporary storage, rainwater collection pools, and slag yards. No Spills have occurred since the Entity commenced operations.</p> <p>The Entity has also defined a process for reporting Spills and Leakages. Any Spill incidents, if they occur, will be publicly disclosed in the Entity's Sustainability Report.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established and operated an Environmental Management System and has developed a Waste Management Procedure. It publicly discloses, on an annual basis, the volume of</p>

CRITERION	RATING	COMMENT
		Waste generated and the corresponding Waste disposal methods in its Sustainability Report, available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1427
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)	Conformance	Spent Pot Lining (SPL) generated by the Entity is classified as Hazardous Waste and is fully declared, transferred, and disposed of in Compliance with regulations via the National Solid Waste Management Information System. Since the establishment of the Entity, no SPL has been landfilled, nor has any SPL been discharged into freshwater or marine environments.
6.8a-d Dross	Conformance	Dross generated by the Entity undergoes comprehensive processing and reutilisation to maximise Aluminium recovery. Secondary Aluminium Dross produced is recycled by the electrolysis plant, whilst all resulting Aluminium Dross slag is fully recovered for reuse.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The Entity's water supply source includes the Shilanshou Mountain water source in Guichang Town, Funing County. This has been disclosed in the Entity's Water Resources Risk Assessment Report. The Entity obtains production and domestic water from Wenshan Baiwen Cross-Provincial Economic Cooperation Park Water Supply and Drainage Co., Ltd., which ensures a long-term and stable water supply for operational needs. Water withdrawal records are available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1360 Details of its water source and usage are available in the Entity's Water Resources Management Plan at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1361 The Entity does not however disclose water withdrawal and use data disaggregated by source and type.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant water-related risks were identified within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has provided an analysis of ecological impact factors in the third-party Environmental Impact Assessment Report for the 900,000-tonne hydropower Aluminium integration project. The Entity is located on construction land within an industrial park where no protected flora or fauna are present. The project's construction and operation are not expected to adversely affect the local ecological structure or balance. The Entity is neither located within nor adjacent to any Protected Areas and is assessed as low risk.
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity, as its Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as its Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity 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 conducted annual assessments of Alien Species and will implement control measures for any identified high-risk species. To date, no Alien Species have been introduced.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located outside the World Heritage Properties and has committed not to undertake any exploration or development activities within World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity is located within the Baise-Wenshan Cross-Provincial Economic Cooperation Zone in Funing County, Wenshan Prefecture, and is not located within any Protected Areas.
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 committed to respecting Human Rights and has published a Human Rights Impact Assessment Report, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1423</p> <p>The Entity has established and implemented Human Rights Due Diligence Procedures, including a Human Rights Due Diligence Form to identify and assess Human Rights risks. The procedures are reviewed annually and are reimplemented whenever significant organisational changes occur or control deficiencies are identified. In addition, the Entity has established a Stakeholder grievance and complaint mechanism, which is available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1354</p> <p>The mechanism supports the prompt resolution of potential Human Rights impacts. To date, no Human Rights disputes have been identified.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established and implemented the procedures for the protection and management of female employees to safeguard women's rights and interests. To assess the effectiveness of its gender equality measures, the Entity has also developed and implemented the Gender Equality and Protection of Female Employees' Rights and Interests Policy, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleid=1429</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 the procedures for the protection and management of cultural and sacred heritage sites to identify local heritage sites and religious sanctuaries and to implement timely protective measures where necessary.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no cultural or sacred heritage sites have been identified within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or significant changes that could result in displacement since joining ASI.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established and implemented a Stakeholder management procedure, respecting the legal and customary rights of Local Communities regarding land, livelihoods, and natural resource use. The Entity has no conflicts with surrounding villages relating to land use, customs, or other matters. Mitigation measures have been developed and implemented to address identified impacts on Local Communities, and no complaints have been received to date.</p> <p>The Entity has identified Affected Populations and Organisations and has developed a Management Plan for Affected Populations and Organisations, available at: www.shenhuo.com/profile/upload/2025/11/14/3bf4c389-be68-4ecl-9b05-2f32cbccfall.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity's ASI Performance Standard Manual prescribes that the Entity shall not participate in armed conflicts or Human Rights violations. The Entity annually assesses whether its operations or direct raw material suppliers are in Conflict-Affected or High-Risk Areas (CAHRAs). It undertakes not to engage in conflicts, either directly or through its Business relationships, and conducts Due Diligence and risk assessments to manage potential impacts.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Alumina used by the Entity is primarily sourced from manufacturers and third-party traders through indirect procurement. The Entity periodically reviews its supplier base to ensure that no suppliers are located in CAHRAs. To identify and assess potential risks,

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		the Entity conducts annual ASI supplier Due Diligence assessments and issues a supplier ASI Due Diligence questionnaire.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the supplier Due Diligence has not identified any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has conducted annual Due Diligence on ASI suppliers, contractors, and service providers, using the Supplier ASI Due Diligence Form to assess whether any supplier or direct raw material source is allegedly implicated in Human Rights violations in CAHRAs. The findings of the Entity's annual supply chain Due Diligence are disclosed in the Sustainability Report, available at: http://www.shenhuo.com/home/content/content/?categoryId=19&articleId=1422
9.9 Security practice	Conformance	The Entity has developed and implemented Comprehensive Social Security Management Regulations and established a dedicated leadership group for social security management. The regulations have defined overall management requirements as well as personnel and vehicle access control procedures, ensuring that security personnel understand their responsibilities and respect Human Rights. No security-related complaints or grievances 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 the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union in accordance with Chinese law. The Entity permits Workers to freely select their own representatives. Where required, the Entity assists each department in electing employee representatives responsible for monitoring and raising issues related to safety, health, welfare, and ASI social management.
10.2a-c Child Labour	Conformance	The Entity has established and implemented the Child Labour and Underage Workers Management Procedure, prohibiting the use of Child Labour and the employment of child or underage Workers. The Entity employs no child or underage Workers, with the youngest employee is aged 18 or above.
10.3a-c Forced Labour	Conformance	The Entity has established and implemented the management procedures for the prohibition of Forced Labour and the management procedures for the prohibition of Human Trafficking. It does not engage in Forced Labour or Human Trafficking and does not require any security deposits or advance payments from employees during recruitment. The Entity does not restrict Workers' freedom of

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		<p>movement within the workplace or their freedom during working hours.</p> <p>An annual Modern Slavery Statement has been prepared, outlining actions taken to address Modern Slavery, available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1349</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established management procedures and is committed to non-Discrimination and equal opportunity. Through a Human Rights Due Diligence process, the Entity supports the application of the principle of non-Discrimination across all Business activities. No instances of Discrimination have been reported to date.
10.5 Communication and engagement	Conformance	The Entity has established and implemented a consultation, communication and information exchange management procedure to encourage employee participation in the ASI Management System. Issues may be raised directly with employee representatives and members of the Work Safety Management Committee, including through Worker representative meetings, dedicated complaint hotlines, and email channels.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Policy to eliminate workplace Violence and Harassment in accordance with the Management Procedures for the Prohibition of Mental and Physical Abuse. The Policy is available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1421
10.7a-c Remuneration	Conformance	The structure of substantive wages is clearly defined in accordance with local legal requirements, and basic wages exceed the statutory minimum wage. Total remuneration is sufficient to meet Workers' basic living needs and is recorded and disbursed to employees via bank transfer on the 25 th of each month. All employees are enrolled in compulsory social insurance schemes, including five social insurances and two housing provident funds.
10.8a-c Working Time	Conformance	The working hours of on-site staff are governed by national laws and regulations and their employment contracts. While some Overtime occurs, it is entirely voluntary, and the Entity pays the corresponding Overtime wages. Daily working hours are recorded through a clock-in and clock-out system and confirmed monthly by employees. Working hours are monitored and comply with China's Labour Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights through written documentation and safeguards these rights. The Entity fulfils its duty to inform employees of their rights through the staff representative assembly and Labour Unions. Employees may also access information on their rights and obligations through letters, online communication, telephone, or 'face-to-face' discussions.
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 and obtained ISO 45001:2018 Certification. On-site observations, document reviews, and employee

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		interviews confirm effective implementation of the management system.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity regularly reviews its OH&S Management System through periodic safety production meetings, annual compliance assessments, internal audits against ISO 45001:2018, and management review activities. The system and related Policies are also reviewed whenever changes occur, or control deficiencies are identified. The OH&S objectives and targets for 2024–2025 have been achieved. The effectiveness of the system is available at: http://www.shenhuo.com/home/content/content/?categoryid=19&articleid=1426
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established and implemented mechanisms for gathering employee feedback on OH&S. Through Labour Unions, safety committees, employee representatives, and other channels, feedback is regularly communicated to management, enabling discussion and participation in resolving OH&S issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 March 2023	Initial Certification Audit - Full Certification.
1	6 April 2023	Text amendment - Revised to update hyperlinks.
2	13 December 2023	Surveillance Audit
3	19 August 2024	Individual ASI Membership for YUNNAN SUNHO ALUMINUM CO., LTD was superseded and the Entity has been included under the HENAN SUNHO COAL & POWER CO., LTD membership
4	28 March 2025	Surveillance Audit
5	3 June 2026	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply PS V3.1.