

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Guangdong Xingfa Aluminium Co., Ltd

CERTIFICATE NUMBER

570

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

DATE OF ISSUE

10 JULY 2026

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

9 JULY 2029

ASI ACCREDITED
AUDITING FIRM

CHINA QUALITY MARK
CERTIFICATION
GROUP

CERTIFIED SINCE

10 JULY 2026

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. He'.

CERTIFICATION SCOPE

Production and related management activities of Aluminium alloy architectural and industrial profiles at Guangdong Xingfa Aluminium Co., Ltd located in Guangdong Province, China.

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Guangdong Xingfa Aluminium Co., Ltd
ENTITY NAME	Guangdong Xingfa Aluminium Co., Ltd
CERTIFICATION SCOPE	Production and related management activities of Aluminium alloy architectural and industrial profiles at Guangdong Xingfa Aluminium Co., Ltd located in Guangdong Province, China.
SUPPLY CHAIN ACTIVITIES	- Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	First Certification Audit
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	13 -15 April 2026
AUDIT REPORT SUBMISSION	22 May 2026
AUDIT SCOPE	The Audit Scope included the activities and facilities related to the production of Aluminium alloy architectural and industrial profiles at F9 Guangdong Xingfa Aluminium Industry Co., Ltd., located at No.23 Qiangye Avenue, Leping Town, Sanshui District, Foshan City, Guangdong Province, China. Supply chain activities included in the Audit Scope: - Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication 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 10 July 2026 – 9 July 2029

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 10 January 2028

CERTIFICATE NUMBER 570



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

Guangdong Xingfa Aluminium Co., Ltd. (referred to as "Xingfa") is headquartered in Foshan City, Guangdong Province. Xingfa is a large-scale enterprise specialising in the production of architectural and industrial Aluminium profiles. Founded in 1984, the company was listed on the Hong Kong Stock Exchange on March 31, 2008. Between 2011 and 2018, Guangdong Guangxin Holdings Group Ltd. (a provincial state-owned enterprise) and China Lesso Group Holdings Ltd. successively joined Xingfa's board of directors, setting a precedent for mixed state-private ownership in China's Aluminium profile industry.

Since 2009, Xingfa Aluminium has expanded its production base in multiple locations—including Chengdu (Sichuan), Yichun (Jiangxi), Qinyang (Henan), and Huzhou (Zhejiang)—while simultaneously upgrading its headquarters facility in Sanshui District, Foshan, Guangdong. This expansion enabled the Entity to establish seven major production bases across China. To expand its international market, Xingfa Aluminium has also invested overseas by establishing subsidiaries and factories. The Xingfa Australia factory was completed and started its operations in July 2025. Xingfa's Vietnam factory will be completed and is planned to start its operations in the second half of 2026.

The Foshan City plant (the Entity) produces Aluminium profiles and engineering solutions for building doors, windows, curtain walls, electronic equipment, mechanical machinery, rail transit, aerospace, and shipbuilding industries. It employs approximately 2500 people, of whom 800 are women.

The Entity operates 12 casting machines and 37 extruders. Among these, 8 casting machines and 37 extruders are currently in operation. The Entity's total production volume was approximately 220,000 tonnes in 2025.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and maintains effective operational procedures for "Law and Regulation Identification" and "Compliance Assessment." The Technical Quality Department is responsible for compiling and consolidating applicable laws and regulations, while the Entity's Compliance, Legal, and Risk Management Department evaluates compliance adherence to ensure full compliance with regulatory requirements.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-Bribery Policy, formed an Anti-Bribery Management Team, and set up an Anti-Bribery Risk Assessment Group. It conducts annual summaries and evaluations of the implementation of anti-bribery measures.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct in accordance with environmental, social, and governance policies requirements, and conducts regular annual reviews of the code. The Code of Conduct is available on the Entity's website. https://www.xingfa.com/asizlgs/info_257_itemid_7972.html
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity outlines its Environmental, Social, and Governance (ESG) policies in its Management Manual, with annual reviews conducted. It has implemented environmental, social, and governance policies, which are promptly reviewed when changes occur. The policies are communicated internally to all stakeholders through document training and on-site demonstrations, while externally via promotional materials and corporate culture briefings. https://www.xingfa.com/asizlgs/info_257_itemid_7974.html
2.2a-c Leadership	Conformance	The Entity has appointed a senior executive of the Entity as the Manager Representative for ASI matters, responsible for leading and implementing the Entity's established policies and meeting all standard requirements.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity is certified under the Environmental Management System ISO 14001.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management System covering Human and Labour Rights aspects, to oversee its implementation.
2.4a-e Responsible Sourcing	Conformance	The Entity has established "Procurement Control Procedures" covering environmental, social, and governance aspects. The Entity's Procurement Policy is available at: https://www.xingfa.com/asizlgs/info_257_itemid_7971.html
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 planned. However, the Entity has established a "Control Procedure for Environmental and Occupational

CRITERION	RATING	COMMENT
		Health and Safety Assessment of New Projects," outlining procedures for project submission, environmental impact and risk assessment, and documentation requirements.
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 planned. However, the Entity has established a "Control Procedure for Environmental and Occupational Health and Safety Assessment of New Projects," outlining procedures for project submission, environmental impact and risk assessment, and documentation requirements.
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity has established Safety and Environmental Emergency Response Plans in consultation with internal and external stakeholders. Regular simulations and emergency drills are conducted to assess the effectiveness of these plans. The Emergency Drill Plan is available at the Entity's website. https://www.xingfa.com/aszlgs/info_257_itemid_7968.html However, the Entity has not disclosed its environmental and safety emergency response plans as required.
2.8a-d Suspended Operations	Conformance	The Entity has established "Business Suspension and Resumption Management Procedures" to address production halts or shifts caused by force majeure events, incorporating measures to mitigate significant adverse impacts on environmental, social, and governance aspects. The procedures are reviewed whenever any changes occur that alter the nature or scale of ESG risks. No such changes have been implemented to date.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the "Mergers and Acquisitions Procedure," which includes requirements for pre-implementation preparations, potential risks, and risk mitigation measures during the transaction. When implementing mergers and acquisitions projects, environmental, social, and governance factors are considered as critical criteria. The Entity has not undergone any mergers or acquisitions to date.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has specified the relevant requirements for closure, decommissioning, and divestment in its Management Manual. The Closure, Decommissioning, and Divestment Control Procedures have been established to outline operational workflows in accordance with requirements. To date, the Entity has not experienced any closures, decommissionings, or divestments.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non-Conformance	The Entity has elaborated a Sustainability Report 2025 covering corporate governance, compliance operations, risk management, sustainability governance, customer service, occupational health performance, environmental compliance management, social responsibility profile, economic performance indicators report, environmental performance indicators report, publicly disclosed data, environmental and Labour performance indicators report, Human Rights performance indicators report, social contributions, and product performance. The Report is available at: https://www.xingfa.com/aszlgs/info_257_itemid_7967.html

CRITERION	RATING	COMMENT
		However, the Sustainability Report does not present a quantitative analysis, and the material impact assessment is insufficient.
3.2 Non-compliance and Liabilities	Conformance	The Entity has clearly defined the requirements regarding violations and liabilities. Its Sustainability Report discloses information on significant fines, court judgments, penalties, and non-monetary sanctions, confirming the absence of any non-compliance or liabilities. For more information, see page 1 of the Sustainability Report. https://www.xingfa.com/aszlgs/info_257_itemid_7967.html
3.3a-c Payments to Governments	Conformance	In accordance with Anti-Corruption Policy requirements, all payments made to the government are conducted in compliance with legal and tender contract provisions. Each payment is documented in financial records and undergoes regular financial audits to verify the legality of both the payments and their amounts. The "Social Benefits of Payments to the Government" and other information are available in the Sustainability Report: https://www.xingfa.com/aszlgs/info_257_itemid_7967.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaint Resolution Mechanism and related procedures to address stakeholders' complaints, grievances, and information requests related to their operations. The Office for System Implementation and Oversight is responsible for monitoring stakeholders' requests and complaints. https://www.xingfa.com/aszlgs/info_257_itemid_7979.html Call: 0757-66639069 Email for complaints: jianshen@xingfa.com
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has conducted a Life Cycle Assessment (LCA) report for Aluminium Alloy Building Profiles (Powder Spraying Type), including an evaluation of their lifecycle impacts. In identifying environmental factors, the Entity has taken into account impacts throughout the entire Life Cycle of Aluminium products. However, the LCA is not compliant with Chinese Law nor with ISO requirements.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has prepared the Product Life Cycle Assessment Report for Aluminium Alloy Building Profiles (Powder Spraying Type), detailing the methodology from defining objectives and scope, delineating system boundaries, collecting data across various stages, to compiling the final Life Cycle inventory and analysing environmental impact indicators. The full Life Cycle encompasses the procurement of raw materials (Aluminium ingots and rods) to the production of Aluminium profiles, assessing the entire manufacturing process and interpreting the environmental impacts generated at each stage. The Life Cycle Assessment Report is available at: https://www.xingfa.com/aszlgs/info_257_itemid_7976.html
4.2 Product Design	Conformance	The Entity has established a Design and Development Control Procedure that integrates its sustainability objectives into the product design workflow.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established objectives for waste recycling, reuse, or repurposing as stipulated in the "Collection and Recycling of End-of-Life Products – Recycling Strategy for Aluminium Products" and the "2025 Hazardous Waste Transfer Details." The overarching goal is to achieve by 2028: a total Aluminium scrap recovery rate of ≥95% across

CRITERION	RATING	COMMENT
		all production processes (with an internal reuse rate of ≥80%), a utilisation ratio of recycled Aluminium ≥30% in smelting operations, and a 100% compliance rate for outsourced Aluminium Scrap disposal
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	Minor Non-Conformance	The Entity participates in and is committed to activities at the local, regional and national levels to promote the development of collection and recycling systems, thereby increasing recycling rates. The Entity participates in the formulation of relevant industry standards and group standards. However, sufficient evidence could not be identified to demonstrate the specific work undertaken by the Entity to boost the recycling of products at the end of life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity is a key energy-consuming unit in Guangdong Province. It submits quarterly/annual production volume, output value, and energy consumption data (including electricity, natural gas, and a small amount of diesel) to the Guangdong Provincial Energy Regulatory Authority (Energy Conservation Centre) via the "Guangdong Provincial Energy Bureau Energy Management Centre Platform." Information about the Entity's Energy Use is available in the 2025 Energy Utilisation Status Report: https://www.xingfa.com/aszlgs/info_257_itemid_7978.html The 2025 Greenhouse Gas Emission Verification Report details Raw Material sources and Greenhouse Gas Emissions. The report has been independently verified by a third-party, and it's available at: https://www.xingfa.com/aszlgs/info_257_itemid_7964.html However, the emission factors were not directly derived from the suppliers' specific primary data, and the selection was inappropriate.
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	Minor Non-Conformance	The Entity has implemented a Greenhouse Gas Reduction Plan using the ASI GHG Reduction Pathway methodology and calculation tools. The plan encompasses emission-reduction pathways for both operational processes and procurement activities, aligning with the 1.5°C temperature-rise control scenario. The baseline year is 2025. The actual planned emission reduction amount is shown in Table 4 under the emission reduction targets: https://www.xingfa.com/aszlgs/info_257_itemid_7963.html

CRITERION	RATING	COMMENT
		However, the current strength of the purchased Aluminium is based on suppliers' figures rather than those in the physical LCA report. Moreover, from the entity's perspective, it is difficult to see how it can achieve its decarbonization goals. The entity needs to further consider low-carbon procurement.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has developed and implemented a GHG Reduction Plan using the ASI Greenhouse Gas Reduction Pathway methodology and calculation tools. The Entity conducts a review of the Greenhouse Gas Emission pathway whenever it modifies its reduction benchmarks or targets. The GHG Reduction Plan is available at: https://www.xingfa.com/aszlgs/info_257_itemid_7963.html
5.4 GHG Emissions Management	Conformance	The Entity has developed and implemented relevant procedures to achieve its greenhouse gas reduction targets and to assess whether actual reductions meet these targets. The Entity's initiatives to manage its emissions include optimising production processes and scheduling; extruder technical improvement projects; upstream collaboration for carbon reduction; procurement processes and material-use control; supplier selection; annual GHG Emissions verification and disclosure; and the implementation of GHG Emission reductions and the assessment of target achievement.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity's discharge permit specifies and quantifies the exhaust emission outlets, types of pollutants, and the maximum allowable emission concentrations. The Entity has constructed and operates waste gas treatment facilities. In accordance with its license and applicable legal requirements, the Entity conducts regular monitoring of its waste gas emissions. The monitoring results demonstrate that the Entity complies with local statutory emission standards. The 2025 Pollutant Emissions Status and Reduction Plan and Targets outline the sources and types of atmospheric pollutants, along with the corresponding reduction targets and measures. https://www.xingfa.com/aszlgs/info_257_itemid_7962.html
6.2a-g Discharges to Water	Conformance	The Entity's discharge permit specifies and quantifies the types of water pollutants to be discharged, along with their respective concentration limits. The Entity has constructed and operates wastewater treatment facilities. Discharge data from wastewater outlets is transmitted to local environmental protection authorities for real-time monitoring, ensuring compliance with local discharge requirements. The Entity has prepared the 2025 Pollutant Emissions Status and Reduction Plan and Goals detailing the types and emission volumes of water pollutants for 2025. https://www.xingfa.com/aszlgs/info_257_itemid_7962.html
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has formulated and implemented an Emergency Response Plan for Environmental Incidents, which is reviewed every three years. During operations, when leaks or seepage may occur, the Entity implements risk control measures (including emergency response plans) based on risk level classification and specific risk types. More information is available in the Leakage/Risk Identification and Management Plan Overview: https://www.xingfa.com/aszlgs/info_257_itemid_7958.html

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity stipulates that any leakage or seepage incidents must be disclosed as required. No leakage or seepage incidents have occurred in the past year.
6.5a-c Waste Management and Reporting	Conformance	The Entity has established and implemented an Environmental Management System, which includes a Waste Management Strategy. It has also implemented Waste Management Procedures and publicly discloses annually the volume of waste generated and the methods of waste disposal. More information is available in the Information Disclosure Report on Hazardous and Non-Hazardous Waste: https://www.xingfa.com/aszlgs/info_257_itemid_7957.html
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	The Entity has established a collection and recycling process for Aluminium Dross and conducts monthly reviews of Dross recycling management activities. As hazardous waste, Aluminium Dross is legally transferred and disposed of through the Guangdong Provincial Hazardous Waste Supervision System Platform, with treatment handled by qualified entities. The Entity assigns dedicated personnel to annually verify the final destination of Aluminium residues, ensuring all disposal complies with regulatory requirements.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity sources water from the local municipal water distribution network, as stated in the Environmental Impact Assessment Report. The primary water consumption categories include process water and water for employee office and domestic use. The Water Resources Risk Assessment Report indicates a low-risk profile for water resources: https://www.xingfa.com/aszlgs/info_257_itemid_7956.html Water Management Assessment and Disclosure Report: https://www.xingfa.com/aszlgs/info_257_itemid_7977.html
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Water Resource Risk Assessment indicates a low risk.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is not located within any Protected Area and poses no significant risk or potential impact on biodiversity and ecosystems; it is assessed as low-risk and with low potential impacts. The Entity's Biodiversity Risk Assessment Report is available at: https://www.xingfa.com/aszlgs/info_257_itemid_7955.html
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as it poses low or minimal potential impacts on biodiversity and ecosystems.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as it poses low or minimal potential impacts on biodiversity and ecosystems.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as it poses low or minimal potential impacts on biodiversity and ecosystems.
8.4 Alien Species	Conformance	The Entity conducts annual assessments of invasive species and implements control measures for high-risk sources. Currently, no invasive species have been identified by the Entity.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The site is located in an industrial park in Guangdong Province and is not near any World Heritage Site. The Entity has therefore committed not to explore or construct New Projects at the World Heritage site.
8.6a-d Protected Areas	Conformance	The Entity is located in an industrial park in Guangdong Province, which is not near any Protected Areas. Every construction project undergoes environmental impact assessments in accordance with China's laws.
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	The Entity has established a Human Rights Due Diligence Procedure that outlines methods for identifying, preventing, mitigating, and addressing actual and potential Human Rights impacts. The Human Resources Centre conducts annual assessments of the Entity's Human Rights status and potential impacts, compiling a Human Rights Due Diligence record. When signs of control deficiencies are identified, the Human Rights Policy is reviewed. The Entity's Human Rights Policy is available at: https://www.xingfa.com/asizlgs/info_257_itemid_7953.html Human Rights Due Diligence Form: https://www.xingfa.com/asizlgs/info_257_itemid_7969.html
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has established the Procedures for the Protection and Management of Female Employees, and, through their implementation, it ensures the respect for women's rights and interests. The document “Explanation on Gender Equality and Women's Rights” establishes safeguards for the legitimate rights and interests of female employees and measures to protect their special interests, and is available at: https://www.xingfa.com/asizlgs/info_257_itemid_7952.html Although the Entity has a Policy related to Gender Equity and Women's Empowerment, it does not disclose data on the effectiveness or actions taken to implement this policy.
9.3a-i Indigenous Peoples	Conformance	The Entity respects the customs, rights, and interests of the ethnic minorities and local residents in its operational area. The Indigenous People Protection Procedure has been established to identify the types of indigenous communities at the Entity's location and their

CRITERION	RATING	COMMENT
		relevant interest factors regarding customs, land, and resources. Currently, there are no indigenous communities surrounding the Entity.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity as no New Projects or significant changes have occurred since the Entity joined ASI.
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 no New Projects or significant changes have occurred since the Entity joined ASI.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity established and implemented the Procedure for Handling Cultural Sites and Religious Landmarks, enabling it to assess the status of local sites and religious landmarks and take appropriate protective measures in a timely manner.
9.5b Cultural and Sacred Heritage – Impacts	Conformance	The Entity is located within an industrial park, with no indigenous residents or Cultural and Sacred Heritage properties in the vicinity.
9.6a-i Displacement	Conformance	The Entity has established a Relocation and Resettlement Procedure. During the design phase of New Projects, the Entity prioritises feasible alternative solutions to avoid or minimise population relocation. Currently, the Entity has no resettlement projects underway.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented a Stakeholder Management Procedure that respects the legal and traditional rights of local communities regarding their land, livelihoods, and use of natural resources. The Entity has no conflicts with neighbouring villages concerning land use, customs, or other matters. Control measures have been formulated and implemented in response to identified impacts on local communities.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity is committed to not facilitating armed conflict or Human Rights violations. Annually, the Entity conducts inspections in CAHRAS to verify suppliers' operational activities. It commits to avoiding direct involvement in conflicts or participation through its business relationships; if raw materials are sourced from such regions, the Entity performs Due Diligence and risk assessments. The Entity's 2026 List of Qualified Suppliers states that raw materials are sourced from CAHRAS. The Entity's Responsible Procurement Policy is available at: https://www.xingfa.com/asl/zlgs/info_257_itemid_797.html
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity's raw materials are primarily sourced from manufacturing enterprises and third-party traders. Upon reviewing the List of Qualified Suppliers, it is confirmed that none of the listed suppliers is located in Conflict-Affected and High-Risk Areas. No potential risks arising from the procurement of raw materials from CAHRAS have been identified.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity as it does not source materials from CAHRAS.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity conducts annual certification audits under ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018 to evaluate the implementation of procurement control procedures and assess their suitability and effectiveness. The Entity's Due Diligence practices have been audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity conducts annual Due Diligence and risk assessments to determine whether any business operations or direct raw material suppliers are located in Conflict-Affected and High-Risk Areas. If such operations or suppliers exist, the assessment is performed annually using the Supplier Due Diligence Form. Currently, there are no operational activities or direct raw material suppliers originating from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented the Security Management Regulations, clarified the responsibilities of security personnel and provided training to ensure all security staff understand their duties and adhere to Human Rights principles.
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 Applicable Law 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 Trade Union in accordance with Chinese law. When the Trade Union's Freedom of Association and Collective Bargaining Rights are restricted by local laws, the Entity allows Workers to freely choose their own Worker representatives. When necessary, the Entity is obligated to assist various departments in electing their own employee representatives, who are responsible for overseeing and raising issues related to safety, health and welfare with management.
10.2a-c Child Labour	Conformance	The Entity has established the Child and Juvenile Labour Management Procedure, which prohibits the use of Child Labour by requesting information such as copies of original identity cards. The Entity has no child or juvenile employees, with all Workers being at least 18 years of age.
10.3a-c Forced Labour	Conformance	The Entity has established and implemented the Procedures for Managing Prohibition of Forced Labour, ensuring no Forced Labour occurs, rejecting human trafficking, and refusing to demand any form of security deposit or guarantee from employees. It does not restrict Workers' freedom of movement at the workplace or employees' freedom within reasonable timeframes. The Entity's statement regarding Modern Slavery is available at: https://www.xingfa.com/asizlgs/info_257_itemid_7949.html
10.4a-c Non-Discrimination	Conformance	The Entity has implemented the Anti-Discrimination Management Procedure, established an effective monitoring mechanism, and employed a Human Rights Due Diligence checklist to ensure the

CRITERION	RATING	COMMENT
		principle of non-discrimination is upheld across all business operations. It also provides training, promotes awareness campaigns, and has established complaint channels to foster a Non-Discriminatory culture. When employees experience discrimination, they may submit written feedback to the suggestion box or file oral/written complaints. An investigation will be conducted, and the complaint will be addressed within 15 days.
10.5 Communication and engagement	Conformance	The Entity has implemented the Consultation, Communication, and Information Exchange Management Procedures. Any issues can be addressed directly with employees or representatives of the Occupational Safety and Health Management Committee. The Entity has dedicated communication channels for external stakeholders, accessible by phone or email. Additionally, a complaint resolution system has been established and disclosed on the website: https://www.xingfa.com/aszlgs/info_257_itemid_7979.html Complaints hotline: 0757-66639069 Complaints email: jianshen@xingfa.com
10.6a-g Violence and Harassment	Conformance	The Entity has established the Anti-Violence and Anti-Harassment Management Procedure. No individual may engage in or tolerate the use of corporal punishment, psychological or physical coercion, harassment, gender-based violence measures—including sexual harassment—or verbal insults. Employees may file complaints and provide feedback regarding any unfair treatment related to disciplinary measures in accordance with the negotiated, communicative, and information-sharing control procedures. The Entity has established a Policy to eliminate workplace violence and harassment, which is available at: https://www.xingfa.com/aszlgs/info_257_itemid_7948.html
10.7a-c Remuneration	Conformance	The Entity has established and implemented the Compensation Management Procedure. The human resources department is responsible for signing labour contracts with employees, ensuring they have a clear understanding of employment terms and compensation packages. The Entity's standard wages are never lower than the minimum wage set by local authorities, and employee salaries are sufficient to meet basic living needs and provide financial security for families. The Entity guarantees that all wages and benefits comply fully with applicable laws, and payments are made in a manner convenient for employees. Overtime work is compensated with overtime pay as stipulated by national labour laws. It does not make unreasonable wage deductions for disciplinary purposes and pays salaries monthly.
10.8a-c Working Time	Conformance	The Entity complies with applicable laws and industry standards regarding working hours and public holidays. The standard workweek (excluding overtime) shall not exceed 40 hours as stipulated by law. It observes national statutory holidays and pays annual leave provisions, as per the Labour Law of the People's Republic of China, which mandates that employees must have at least one day off for every six consecutive working days. Overtime is entirely voluntary, with weekly overtime not exceeding 8 hours, and an average daily working hour of 8 hours must be maintained over a six-month period.

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights through official documents and safeguards these rights. The freedoms of association and collective bargaining are subject to relevant legal restrictions; the Entity fulfils its obligation to disclose these rights to employees through the work of employee representative councils and trade unions. Employees may also learn about their rights and obligations via other means such as letters, emails, phone calls, or face-to-face meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity is ISO45001 certified and continuously improves its OHSMS (Occupational Health and Safety Management System), which undergoes annual supervisory audits.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity regularly reviews its OHSMS through periodic safety meetings, annual compliance assessments, internal audits, and management reviews. The system and policies are reviewed whenever any changes occur, or signs of control deficiencies emerge. The Entity provides occupational health and safety performance data for 2025, including an analysis of leading and lagging indicators' performance relative to peers in the same industry. https://www.xingfa.com/aszlgs/info_257_itemid_7947.html
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides feedback to management and participates in and discusses addressing occupational health and safety issues through mechanisms such as the establishment of trade unions, environmental and safety committees, and employee representatives. Feedback and suggestions are investigated and analysed, and measures are taken when necessary.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 July 2026	Initial Certification Audit – Full Certification