

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hebei New Lizhong Nonferrous Metals Group Co., Ltd

CERTIFICATE NUMBER
431

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**SGS-CSTC STANDARDS
TECHNICAL SERVICES**

DATE OF ISSUE
13 MARCH 2025

DATE OF EXPIRY
12 MARCH 2028

CERTIFIED SINCE
13 MARCH 2025

AUTHORISED BY

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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

Design and manufacture of
Aluminium alloys, Aluminium
master alloys and silicon-
Aluminium dispersion composite
materials through melting,
powdering, hot isostatic pressing
and machining processes at Hebei
New Lizhong Nonferrous Metals
Group Co., Ltd, Hebei Province,
China.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Lizhong Group
ENTITY NAME	Hebei New Lizhong Nonferrous Metals Group Co., Ltd
CERTIFICATION SCOPE	Design and manufacture of Aluminium alloys, Aluminium master alloys and silicon-Aluminium dispersion composite materials through melting, powdering, hot isostatic pressing and machining processes at Hebei New Lizhong Nonferrous Metals Group Co., Ltd, Hebei Province, China.
SUPPLY CHAIN ACTIVITIES	- Aluminium Re-melting/Refining - Casthouses - Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (19 – 20 November 2024) - Surveillance Audit (17 – 18 August 2026)
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	19 – 20 November 2024 (Initial Certification Audit) 17 – 18 August 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	12 December 2024 (Initial Certification Audit) 5 September 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (19 – 20 November 2024)</u> The Audit Scope included the design and manufacture of Aluminium alloys, Aluminium master alloys and silicon-Aluminium dispersion composite materials at Hebei New Lizhong Nonferrous Metals Group Co., Ltd located in Hebei Province, China. Supply chain activities included in the Audit Scope: - Aluminium Re-melting/Refining - Casthouses - Material Conversion All applicable Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (17 –18 August 2026)</u> The Audit Scope included the design and manufacture of Aluminium alloys, Aluminium master alloys and silicon-Aluminium dispersion composite materials at Hebei New Lizhong Nonferrous Metals Group Co., Ltd located in Hebei Province, China. Supply chain activities included in the Audit Scope: - Aluminium Re-melting/Refining

- Casthouses
- Material Conversion

Criteria that were identified as non-conformities from the previous Audit 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

13 March 2025 – 12 March 2028

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

12 March 2028

CERTIFICATE NUMBER

431



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

Hebei New Lizhong Nonferrous Metals Group Co., Ltd (the 'Entity') was created in November 2019 following a strategic restructure and name change from Bei Lizhong Nonferrous Metals Group Co., Ltd., which was founded in 1984. The Entity produces special high-strength Aluminium alloys for automotive wheels and engines. It has a registered capital of 534 million yuan and currently employs more than 120 persons including more than 50 professional technical personnel.

The Entity is located in the western area of the Economic Development Zone, Qingyuan District, at No. 338, Development Road, Qingyuan District, Baoding City, Hebei Province. The area surrounding the Entity, across a 500 metre radius is primarily industrial enterprises, and there are no environmentally sensitive areas including residential locations.

The Entity has nine sets of Aluminium alloy melting furnaces, and the current annual production capacity of high-strength Aluminium alloy products is 160,000 tonnes, of which 80% is used to produce automobile wheels and parts, and 20% is used for products applied to high-speed rail, electrical appliances, consumer electronics, communication electronics, high-end equipment, ships and other fields. The Entity's silicon-Aluminium dispersion composite new material business department specialises in the research and development of silicon-Aluminium alloys and their devices, Aluminium-based composite materials, microcrystalline Aluminium alloys and 3D printing Aluminium alloy materials, which has an annual production capacity of 100 tonnes. The products are mainly used in optical, high-end precision equipment, target materials and 3D printing fields.

It produces dozens of varieties of Casting Aluminium alloy ingots that meet the standards of the Aluminum Association (AA), Japanese JIS standards, China National Guobiao Standards (GB), and other industry standards. The products are sold to more than 20 Provinces across China, and are exported to Japan, South Korea, the United Kingdom, Italy, and other countries and regions.

The Entity has obtained ISO 9001, IATF 16949, ISO 14001, ISO 45001, ISO 50001, as well as various second-level safety standard enterprise certifications.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a Management System to maintain awareness and ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The head of the Entity's management department, under the guidance of the Lizhong Group supervision department, collects and handles complaints and reports. The Entity has implemented the Lizhong Group anti-Bribery code of ethics and identified relevant job risks and a list of key roles. The Entity's internal Complaint Management Mechanism is operating effectively, and is disclosed at: http://www.lizhong.com.cn/uploads/tinymce/images/3679f0711720201a47e6f317ea620ccc673cid544ab4b.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct covering principles relevant to environmental, social and governance performance, which was signed off by senior management, available at: http://www.lizhong.com.cn/uploads/tinymce/images/8c276f3b12252d04f7e5e677f4b6d510672eacea30e53.pdf An ASI internal audit and management review is conducted annually to ensure the normal and effective operation of the Entity's Management System.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented an Environmental, Social, and Governance (ESG) Policy and related Policies addressing environmental, Occupational Health and Safety (OH&S), ASI-related performance and energy. The Entity's General Manager has approved each of the Policies. The ESG Policy is internally communicated via training and is available on the notice boards throughout the plant. The Policies are reviewed annually and are available at: http://www.lizhong.com.cn/uploads/tinymce/images/8c276f3b12252d04f7e5e677f4b6d510672eacea30e53.pdf The Entity has adjusted the Policies communicated to suppliers by adding the ASI Policy, which addresses social responsibility and governance in addition to the environmental policy.
2.2a-c Leadership	Conformance	The Entity has appointed the Director of Management as the ASI Management Representative, who has overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented an ISO 14001:2015 certified integrated Management System, which addresses the requirements of an Environmental Management System.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented an integrated Management System and has obtained certification to ISO 45001 and SA8000:2014. The Entity's Management Systems Manual has been implemented to manage risks to Human Rights and Labour Rights.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues. The Entity's Management Systems Manual details the requirements for review of the Policy. The Policy is available at: http://www.lizhong.com.cn/uploads/tinymce/images/3b8aab40f0d378deae216d22753f9332672eefbc5315a.pdf
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 existing Facilities.
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 existing Facilities. However, the Entity has developed a procedure to identify and assess Human Rights risks. The Human Rights Impact Assessment Report is available at: http://www.lizhong.com.cn/uploads/tinymce/images/51b0b45288e07de90877fb0817953988672eef9228d7b.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Preparedness and Response Control Procedures, available at: http://www.lizhong.com.cn/uploads/tinymce/images/f2089f9c9bc8ff8ccef587db3d515ec2672ef1188d92c.pdf The Entity has an Emergency Response Plan that has been filed with the local government, Qingyuan District Emergency Management Bureau of Baoding City. It is stipulated that the Entity must review, update and file the plan every three years.
2.8a-d Suspended Operations	Conformance	The Entity has established a Suspended Operations Management Regulation and Business Resilience Plan. There have been no changes to the Business or control gaps identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure to review environmental, social and governance issues as part of the Due Diligence process for mergers and acquisitions. There are no merger or acquisition activities at the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There are no closure, decommissioning or divestment activities at the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its 2025 Environmental, Social and Governance Report, available at: https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed in the 2025 Environmental, Social and Governance Report that during 2025 it received no Material fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law. The Report is available at:

CRITERION	RATING	COMMENT
		https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf
3.3a-c Payments to Governments	Conformance	This Entity makes payments to government in accordance with the law and is subject to annual financial audits. The Entity's 2025 Financial Audit Report is available at: https://www.lizhong.com.cn/uploads/tinymce/images/7e3daa9209b39938152ee08dbbc05e3b6a72d38fdb7a0.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally sensitive Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. Refer to: https://lwheel.com/pages/6.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has two Product lines; one for Aluminium alloys and the other for silicon-Aluminium dispersion products and has developed a Life Cycle Assessment (LCA) for its a range of cast aluminium alloy ingot products, including the ADC12 series, YZ-1 series, AL001 series. The 2026 LCA Report is available at: http://www.lizhong.com.cn/uploads/tinymce/images/41a48abd9ce00418bd31a1dc7200ebbc672eef32a0c83.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	In 2026, the Entity conducted LCA for a range of cast aluminium alloy ingot products, including the ADC12 series, YZ-1 series, AL001 series and low-carbon recycled A356 series, that is, cast aluminium alloy products made from 100% Recycled Aluminium. The life cycle covered by the LCA report is 'cradle-to-gate', and the functional unit is one tonne of cast aluminium alloy ingots made from 100% Recycled Aluminium. The LCA Report is available at: https://www.lizhong.com.cn/uploads/tinymce/images/75bde9590df40521646c78b6c86deab06a72da53c0170.pdf
4.2 Product Design	Conformance	The Entity has implemented product development planning and control procedures to enhance Circular Economy. It uses recycled materials to the maximum extent feasible within permissible limits, in accordance with both customer requirements and technical specifications.
4.3a-b Aluminium Process Scrap	Conformance	The on-site inspection confirmed that the Entity has classified the Process Scrap according to the types and grades of Aluminium products and recycled them. The recycling rate of Process Scrap is 100%.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established an annual plan for recycling Aluminium Scrap from blocks or Aluminium chips. From 2025 to 2027, production process waste and recycling targets has been determined. The Entity's Aluminium Scrap/Chip Recycling Plan is available at: https://www.lizhong.com.cn/uploads/tinymce/images/a9a3c5c2c0b43998371f24533d31a07f6a72d604eaa13.pdf

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established long-term cooperative relationships with qualified suppliers at the Aluminium Scrap collection and distribution hubs in Tianjin and Baoding and communicates with its recycled material suppliers on a regular basis.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity engaged a consulting agency to assess its Greenhouse Gas (GHG) emissions and energy use. The 2025 Greenhouse Gas Inventory Report, which includes Scopes 1, 2 and 3, and was independently verified by a Third Party (TÜV). The 2025 Greenhouse Gas Emissions Inventory Report is available at: https://www.lizhong.com.cn/uploads/tinymce/images/3568e3dlc338ef65eee92e7cc4c4e6e86a72d33b189d4.pdf The GHG Inventory Verification report is available at: https://www.lizhong.com.cn/uploads/tinymce/images/75021fb6e8af4e95fb902b93484981a76a72d2c701577.pdf
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has published time-bound GHG emissions reduction targets together with a GHG Emissions Reduction Plan to achieve the targets that includes actions to address both Direct and Indirect GHG emissions. The Entity has used the ASI Entity-level GHG Pathways Method and Calculation Tool to calculate the 2024-2027 Casting process slope and Casting procurement slope, with 2023 used as the baseline year. Additional emissions reduction measures include energy management, fuel substitution, refrigerant management, and the purchase of 'carbon quotas'.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	The GHG Emissions Reduction Plan with Intermediate Targets is disclosed at: http://www.lizhong.com.cn/uploads/tinymce/images/a0d26922fbd44da5d1db3230b9697d93672eefef80af4.pdf Whilst the Entity achieved its targets for 2025, the Entity did not, however, achieve its Category 1 and Category 2 GHG targets for 2024. All the Entity's targets for the emissions intensity of purchased Aluminium have been achieved, with actual values far below the target values, as the Entity has increased its purchase of Aluminium Scrap. Additionally, updated emission factors have also contributed to this result.
5.4 GHG Emissions Management	Conformance	The Entity has established the 'Life Cycle Assessment Management Regulations' and implemented the GHG Emissions Reduction Plan, reducing emissions from raw materials, production processes, and

CRITERION	RATING	COMMENT
		energy resources to achieve performance consistent with the reduction plan and goals.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The main atmospheric pollutants emitted by the Entity include particulate matter, sulphur dioxide (SO₂), and nitrogen oxides (NO_x). The Entity has online testing capabilities and regularly monitors atmospheric pollutants as required. Emissions to Air are managed through the Entity's ISO 14001:2015 certified Environmental Management System. The Entity has installed emission purification facilities according to the Environmental Impact Assessment (EIA) report to mitigate adverse effects. The plans for reducing atmospheric pollutants are detailed in the 2025 Pollutant Emissions Report and 2026 Emissions Reduction Plan, available at: https://www.lizhong.com.cn/uploads/tinymce/images/f1f751422fc4e81b3c11fd61616ba1db6a72d4cd64a25.pdf
6.2a-g Discharges to Waters	Conformance	The Entity's production wastewater is recycled and is not discharged. Domestic sewage is treated by septic tank sedimentation with minimal environmental impact and discharged to the Qingyuan District Sewage Treatment Plant.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed the main operational risk areas for Spills and Leakages that could contaminate air, and water. The production wastewater is recycled, and there is no off-site discharge. The Entity has established procedures to assess Spills risks annually. To date, no Leakages or Spills have occurred, and the relevant Emergency Response Plan is disclosed at: http://www.lizhong.com.cn/uploads/tinymce/images/f2089f9c9bc8ff8cce587db3d515ec2672ef1188d92c.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has declared that for 2025 there were no Spills or Leakages in the 2025 Environmental, Social and Governance Report, page 16: https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management programme that defines its Waste management strategies, including how to minimise, reuse, sort and dispose of Waste. A waste disposal risk assessment has been completed. Recyclable Waste is sold for reuse, and a disposal agreement is in place. All Hazardous Waste and solid waste generation and transfer data for 2025 are disclosed in the 2025 Environmental, Social and Governance Report, pages 61-62: https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf In the 2025 Pollutant Emissions Report and 2026 Emissions Reduction Plan, the Entity set Hazardous Waste reduction targets at a 0.1% reduction in Aluminium Dross and a 0.1% reduction in baghouse dust. Both documents are available at: https://www.lizhong.com.cn/uploads/tinymce/images/f1f751422fc4e81b3c11fd61616ba1db6a72d4cd64a25.pdf

CRITERION	RATING	COMMENT
		The Entity has disclosed its Hazardous Waste Management Plan, available at: https://www.lizhong.com.cn/uploads/tinymce/images/d85972110eb28d20b3069a3ec382382a6a72d7948afac.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	The Entity has established and implemented a Hazardous Waste pollution prevention and control responsibility system. During each on-site inspection, waste residues such as Aluminium ash are stored in a dedicated warehouse and are labelled. The warehouse floor is leak-proof to prevent waste residues and leachate from being discharged into the environment. A treatment agreement with a service provider result in the residue being used as a raw material for building materials.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	Most of the water used by the Entity is primarily for circulating cooling in the production workshop, while additional water is utilised for restrooms, guardrooms, and greenery. The Entity has developed a Water Balance Test Report which shows that the water risk is low, available at: http://www.lizhong.com.cn/uploads/tinymce/images/c3421c1222a11d5ce52dfc7144f5073c672ef0a51d139.pdf The Entity has publicly disclosed its water withdrawals and consumption annually. The water risk assessment has been disclosed in the 2023 ESG Report, page 48: http://www.lizhong.com.cn/uploads/tinymce/images/7bac46fe49a1fb6785d77ea0d490e3876795c2e182965.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Water Balance Test Report determined the water risk is low, however, they continue to monitor water intake and water use annually.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and potential impacts on Biodiversity and Ecosystem Services, the result of the assessment is low. The 2026 Biodiversity Assessment Report is at: https://www.lizhong.com.cn/uploads/tinymce/images/a502063281eb4471738f0981f656b15a6a72d70f0ccfc.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services have been determined to be low. There are no identified Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity and control requirements are established.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located in a government-designated industrial zone and has a documented commitment not to explore or build New Projects on or near World Heritage sites.
8.6a-d Protected Areas	Conformance	The Entity is located in a government-designated industrial zone that is not located within or near a Protected Area, and its production and Business Activities are carried out within the industrial zone.
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	Minor Non-Conformance	The Entity has established a Human Rights Policy that embodies respect for Human Rights and gender equality. The Entity has identified potentially Affected Populations and Organisations, including internal employees, external persons, suppliers, and service providers. The Entity has established its Human Rights Due Diligence Regulations and the Complaints Resolution Mechanism. The Entity's gender equality and women's rights plan is reviewed annually and/or when any changes or control deficiencies occur. Management and employee interviews undertaken during the Audit confirmed that no Human Rights violations have occurred. The Entity has updated the Human Rights Impact Commitment Letter which is available at: https://www.lizhong.com.cn/uploads/tinymce/images/fc2941550de8960fa735ffd700be6df36a72dd2929774.pdf The Entity's Human Rights Impact Assessment report does not, however, specify the specific subject areas reviewed during the assessment process, and the assessment was limited only to Workers.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity practices equal pay for equal work, there are no gender restrictions in recruitment processes, and there are no gender Discrimination clauses in contracts. The Entity's 2026 Female Employee Satisfaction Survey Report confirms that there are no significant risks or issues identified in the current workplace. During the Audit, female employees gave positive overall feedback on remuneration, the job itself, communication and collaboration, management systems, safety and environmental protection, equal treatment of women, women's benefits and the complaints and suggestions mechanism. The data of effectiveness of these measures are disclosed in the 2025 Environmental, Social and Governance Report, page 72:

CRITERION	RATING	COMMENT
		https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in 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 in 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 in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has conducted an Environmental Impact Assessment that addresses sacred and/or cultural heritage sites and values within the Entity's Area of Influence. There are no cultural heritage sites or religious holy sites impacted by the Entity's activities.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located in an industrial park and does not have any New Projects or Major Changes that require resettlement. However, the Entity has established a relocation control procedure.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as it is located within government-designated industrial land, and there are no Affected Populations or Organisations.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Conflict Minerals Management Regulation, which clearly states that procurement should identify supply chain risks and propose response plans. At present, all suppliers are based in China.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	During 2025 and 2026, the Entity conducted a supply chain risk assessment with results summarised in the 2026 Qualified Supplier Risk Assessment Form. The assessment of its 16 primary suppliers concluded that none are considered as high risk.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as raw Aluminium material is sourced from China, and the risk assessment determined there is a limited risk of armed conflict or Human Rights abuses in the Entity's supply chain.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices have been audited as part of this ASI Audit, which meets the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity has published its 2026 Due Diligence Report, which summarises the status of its suppliers in respect of safety and environmental protection, conflict minerals, wages and benefits and other matters. The report concludes that suppliers are low risk in all aspects assessed.
9.9 Security practice	Conformance	The Entity's Security Guard Management Regulations provided by the Entity at the initial Audit are no longer in place due to another contracting firm taking over the management of security. The Entity has communicated the regulatory requirements and its expectation of respect for Human Rights to the security management department, who have signed the Security Personnel Commitment on Respect for Human Rights regarding security guards.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the Entity follows Applicable Laws regarding Freedom of Association and Collective Bargaining in China. The Entity commits itself to respect Workers' rights and an association for Workers was established in accordance with legal requirements.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has established regulations regarding Freedom of Association and Collective Bargaining. The Entity does not have a Trade Union but has employee representatives who have been elected through an election process. Workers' representatives represent the concerns of employees to management on their behalf.
10.2a Child Labour	Conformance	The Entity has established a Policy prohibiting the use of Child Labour. There is no Child Labour or young Workers (16 to 18 years) in the Entity, with the youngest Worker confirmed to be 22 years old.
10.3a-c Forced Labour	Conformance	The Entity has established the 'Prohibition of Forced Labor Procedure' and a Policy on Modern Slavery and Human Trafficking. The Policy applies to the Entity and its suppliers and emphasises the importance of compliance with the prohibition of Forced Labour, slavery, and Human Trafficking. Based on Worker interviews and document review, there are no instances of illegal wage deduction, Debt Bondage, or any other form of Forced Labour at the Entity. The Entity's Modern Slavery Statement is available at: http://www.lizhong.com.cn/uploads/tiny_mce/images/e86672664f7ede29535fc470729d990672ef20485226.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established Policies and procedures for the 'Management Regulations on Prohibition of Discrimination', 'Special Protection of Women Workers' and the Employee Handbook covering Discrimination in line with ILO Conventions C100 and C111. The Entity is committed to non-Discrimination. The Entity promotes a culture of anti-Discrimination through training, publicity, internal communication, etc. There are no identified cases or complaints regarding Discrimination.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has established internal and external communication management Policies and feedback channels. According to interviews with Workers undertaken during the Audit, they can communicate directly and frequently with management to resolve issues related to working conditions and workplace and compensation issues without threats of retaliation, intimidation, Violence, or Harassment. The most recent congress was held in January 2026. The opinions raised by the Workers' representatives at the meeting were subsequently adopted.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, and disciplinary measures comply with legal requirements. The Entity's Human Rights Policy has been implemented to prohibit Violence and inhumane treatment of employees. The Entity's ASI Management Manual stipulates that the Policy should be reviewed every five years. Training on the 'Violence and Harassment Management Regulation' is provided to employees, which is available at: http://www.lizhong.com.cn/uploads/tinymce/images/5db499916c57e3fdbcl73d2cfa495700672ef1417a6el.pdf Worker interviews confirmed that there are no incidents or complaints regarding Violence and Harassment.
10.7a-c Remuneration	Conformance	The Entity has a clear wage structure, with some employees receiving a basic wage equal to the statutory minimum wage. The total wage meets the basic needs of Workers, and all Workers are covered by the mandatory social insurance scheme. Overtime wages are paid according to Labour Law. Overtime on weekdays is paid at 1.5 times the basic wage, weekends at 2 times, and statutory holidays are at 3 times. The Entity has established a payroll control procedure, the monthly payment of wages in legal tender and documented. This is reviewed by employees from different departments, and a sample of bank transfer records was reviewed during the Audit.
10.8a-c Working Time	Conformance	The Entity's working hours and Overtime management regulations have clearly defined the working hours requirements for employees. The Entity implements a three-shift, two-operation work system. The average working hours in six months are eight hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides a pre-employment training programme for new employees, covering the Group and corporate culture, the Management System and the Code of Conduct. The Entity informs employees of their right to Freedom of Association and Collective Bargaining through training, e-mail, posters and regular meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001 certified Occupational Health and Safety (OH&S) Management System. The latest surveillance audit was conducted in November 2025, and all Health and Safety aspects complied with the Standard.
11.1b-e Occupational Health and Safety (OH&S)	Conformance	The ISO 45001:2018 certified OH&S Management System is audited by a certification body every three years. The Entity discloses comparative

CRITERION	RATING	COMMENT
Management System - Reviews and disclosure		analyses of performance with peer Businesses, including leading and lagging practices in the 2025 Environmental, Social and Governance Report, pages 87-95: https://www.lizhong.com.cn/uploads/tinymce/images/b01bb22d8825ed3c2ef4160fc42846a16a72dc7c9921b.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with a mechanism to raise, discuss and participate in the resolution of OH&S issues with management. There is a Safety Committee with representatives from management and frontline personnel. Employee representatives participate in the handling of safety accidents and frontline employees participate in hazard identification, evaluation, and control measures development.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 March 2025	Initial Certification Audit – Full Certification
1	21 September 2026	Surveillance Audit