

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Suntown Technology Group Corporation Limited

CERTIFICATE NUMBER

25

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

30 OCTOBER 2026

DATE OF EXPIRY

29 OCTOBER 2029

CERTIFIED SINCE

30 APRIL 2019

AUTHORISED BY

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

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

CERTIFICATION SCOPE

SNTO including the Aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of Aluminium foil at sites in Changsha and Changde (China).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	SNTO
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	SNTO including the Aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of Aluminium foil at sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	- Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (12 – 15 March 2019) - Re-Certification Audit and Scope Change (28 – 29 September 2022) - Surveillance Audit (25 – 27 March 2024) - Surveillance Audit (3 – 5 March 2025) - Re-Certification Audit and Scope Change (2 – 4 June 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	12 – 15 March 2019 (Initial Certification Audit) 28 – 29 September 2022 (Re-Certification Audit and Scope Change) 25 – 27 March 2024 (Surveillance Audit) 3 – 5 March 2025 (Surveillance Audit) 2 – 4 June 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	11 April 2019 (Initial Certification Audit) 6 January 2023 (Re-Certification and Scope Change Audit) 19 April 2024 (Surveillance Audit) 22 April 2025 (Surveillance Audit) 24 July 2026 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<u>Initial Certification Audit (12 – 15 March 2019)</u> The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at the sites in Changsha and Changde (China). Supply chain activities included in the Audit Scope: - Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication - Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (28 – 29 September 2022)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at the sites in Changsha and Changde (China).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

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

Surveillance Audit (25 – 27 March 2024)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at sites in Changsha and Changde (China).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

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

Surveillance Audit (3 – 5 March 2025)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting and casting processes at the Changde site, and cold rolling, heat treatment, cutting and packaging at the Changsha site.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

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

Re-Certification Audit and Scope Change (2 – 4 June 2026)

The Audit Scope covered SNTD operations at both the Changde and Changsha sites. At the Changde site, the Audit included the Aluminium re-melting, casting, rolling, and annealing processes involved in the production of Aluminium alloy coils, sheets, and other basic materials. At the Changsha site, the Audit covered the cold rolling and foil rolling processes for deep processing of Aluminium alloys, transforming the Aluminium sheets into double-zero foils for food packaging.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion

All applicable 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

30 October 2026 – 29 October 2029

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

29 October 2028

CERTIFICATE NUMBER

25



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

Suntown Technology Group (SNTG) (the 'Entity') was established in 2003, with its headquarters located in the Wangcheng District, Changsha City, Hunan Province, China. Its main products include 'double zero' Aluminium foil for food packaging in the food and beverage industry, as well as Aluminium templates for construction. The annual total production of Aluminium foil products is approximately 150,000 tonnes.

The Entity operates primarily through two production plants, including the Changde factory, responsible for remelting and casting rolling processes, and the Changsha factory, which undertakes cold rolling and packaging processes. The Certification Scope covers the Entity's production of its 'double zero' Aluminium foil products. The Entity's production of its Aluminium foil products involves approximately 500 employees.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a management process to identify and assess all applicable legal and other requirements. Compliance is evaluated annually, and the results have been maintained.
1.2 Anti-Corruption	Conformance	The Entity has established an Anti-Corruption Policy and associated management procedure. The Anti-Corruption Policy has been communicated to all Stakeholders. 'Whistleblowing', investigation and disciplinary procedures have been established. The Entity has identified and assessed risks related to Business ethics and high-risk positions and implemented the required control measures.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct addressing the Environmental, Social and Governance (ESG) principles of the ASI Performance Standard. The Code of Conduct is reviewed during the annual management review meetings, following changes to the Business, or when control gaps are identified. The Code is available at: https://www.chinasnto.com/bocupload/202607/1.3%20Code%20of%20Conduct.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented ASI Management Policies addressing the Environmental, Social and Governance (ESG) practices addressed by the ASI Performance Standard. The Policies have been approved by the Entity's General Manager, who demonstrates a commitment to their implementation by providing the necessary resources. The ASI Management Policies are reviewed during the annual management review meetings, following any changes to the Business, or when control gaps are identified. The Policies have been posted throughout the site and communicated to employees, with relevant employees receiving appropriate training. The Policies are available at: https://www.chinasnto.com/bocupload/202607/2.1%20ESG%20Policies.pdf
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative, with the responsibilities and authorities of this role and other management defined to implement the ASI Performance Standard, lead communication of the Policies, and provide appropriate resources.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established, implemented, maintains, and continually improves its Environmental Management System, which is certified to ISO 14001:2015. The Entity holds a valid ISO 14001:2015 Certificate.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety (OH&S) impacts have been identified and assessed, with management measures established and implemented to prevent and/or mitigate these impacts.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented a Responsible Procurement Policy, Supplier Code of Conduct, procedures, and processes that conform to the responsible sourcing requirements. The Entity has conducted second-party Due Diligence audits at major suppliers' sites. The Responsible Procurement Policy and Supplier Code of Conduct are both available at: https://www.chinasnto.com/bocupload/202607/2.4%20ASI%20Code%20of%20Conduct%20for%20Suppliers.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the previous two years. The Entity, however, annually assesses its impacts on the environment, health and safety, and social responsibility, including Human Rights.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the previous two years. The Entity, however, annually assesses its impacts on social responsibility, including Human Rights, and the effects of Historic Aluminium Operations on Baseline Conditions.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and implemented site-specific Emergency Response Plans as part of its certified ISO 14001 and ISO 45001 Management Systems. The plans address identified emergency risks and are supported by regular emergency response training and annual drills to assess preparedness and response effectiveness. Emergency response arrangements are periodically reviewed and updated following significant changes to operational activities or emergency risk profiles, or when control deficiencies are identified. Emergency Response Plans and related information is available at: https://www.chinasnto.com/bocupload/202607/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Change).pdf and https://www.chinasnto.com/bocupload/202607/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Change).pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Management System for identified emergency situations that may suspend the Business, disrupt operations, or adversely affect ESG risks, together with associated control measures. The Business Continuity Management Manual is reviewed during the annual management review meetings, following changes to the Business, or when control gaps are identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management process for mergers and acquisitions in accordance with the requirements of the ASI Performance Standard. No such activities have occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Policy and procedures for managing closures, decommissioning, and divestment. No such activities have occurred in the previous three years.

3. TRANSPARENCY

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	The Entity has published its 2025 annual Sustainability Report, which discloses its governance approach to environmental, social, and economic impacts, as well as its performance in governance, the environment, Human Rights, and labour rights. The annual Sustainability Report is available at: https://www.chinasnto.com/bocupload/202607/3.1%202025%20Sustainable%20Development%20Report.pdf
3.2 Non-compliance and Liabilities	Conformance	Relevant government agencies and organisations indicate that the Entity has not received any Material fines, judgments, penalties, or non-monetary sanctions in 2025 for failure to comply with Applicable Law. The Entity has disclosed this information in its 2025 Sustainability Report, available at: https://www.chinasnto.com/bocupload/202607/3.1%202025%20Sustainable%20Development%20Report.pdf
3.3a-c Payments to Governments	Conformance	All payments to governments, including taxes, are legally required. This information has been disclosed on the Entity's 2025 Sustainability Report, page 37, available at: https://www.chinasnto.com/bocupload/202607/3.1%202025%20Sustainable%20Development%20Report.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established various 'whistleblowing', complaints, and grievance channels, including a hotline for external Stakeholders, a hotline for employees, and an email address. A Stakeholder complaints management procedure has been established and implemented. The Entity's ASI Performance Standard Management Manual specifies that the Complaints Resolution Mechanism shall be reviewed during the annual management review meeting, following changes to the Business, or when control gaps are identified. The Complaints Resolution Mechanism has been disclosed in the Group Stakeholder Complaint Management Regulations, available at: https://www.chinasnto.com/bocupload/202607/3.4%20Stakeholder%20Complaint%20Management%20Regulations%20and%20Annual%20Review.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) of its major Aluminium foil Product lines used for food packaging, systematically identifying and evaluating environmental impacts associated with raw material sourcing, manufacturing processes, energy consumption, Greenhouse Gas emissions, and Waste generation. The LCA methodology, system boundaries, and key assumptions have been defined and documented, with supporting assessment results and records available. The LCA has been used to identify environmental 'hotspots' and to support continuous improvement in resource efficiency and environmental performance.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has maintained documented 'cradle-to-gate' Life Cycle Assessment (LCA) information for its Aluminium foil Products and provides it to customers upon request. The LCA information includes key methodological assumptions, system boundaries, and relevant assessment parameters, enabling customers to understand the assessment scope and basis and appropriately interpret the reported results.

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity has implemented protocols to integrate LCA into the Product design process. These protocols require consideration of multiple environmental factors, including carbon footprint, energy use, water consumption, air emissions, and Waste generation. Greenhouse Gas (GHG) emissions have been incorporated into the design methodology, consistent with the Entity's sustainability objectives.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a target of 100% collection, recycling and/or reuse of Aluminium Process Scrap and implemented a documented Scrap management procedure to support its achievement. Process controls and operational measures have been developed to minimise Scrap generation during Aluminium foil production. All Aluminium Process Scrap is collected and returned to the remelting process for reuse. As the Entity's production uses only a single alloy composition, segregation by alloy type or grade is not required, enabling direct recycling and supporting high material recovery and circular resource use.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	Due to the lack of a well-established Aluminium Scrap collection and recycling system in China, the Entity primarily collaborates within the SNTG Group to collect and reuse Post-Consumer Aluminium Scrap. The SNTG Group is strengthening cooperation with customers under its 2025–2030 Special Action Plan for the Addition of Post-Consumer Recycled Aluminium to increase the use of Recycled Aluminium and improve Post-Consumer Aluminium Scrap recovery rates. The Action Plan is available at: https://www.chinasntg.com/bocupload/202607/4.4%20Action%20Plan%20for%20the%20Addition%20of%20PCR%20Aluminum.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has quantified and disclosed its organisation-level energy consumption and Greenhouse Gas (GHG) emissions in accordance with ISO 14064. The GHG inventory covers Scope 1, Scope 2, and relevant Scope 3 emissions, providing an account of emissions associated with its operations. Reported data have been independently verified by a qualified third party. Verified GHG emissions and related information are available in the Entity's GHG Emissions Report, available at: https://www.chinasntg.com/bocupload/202607/5.1%20Greenhouse%20Gas%20Report.pdf Some emission factors for raw materials, however, were based on database defaults rather than primary data, which may not adequately reflect the Entity's operating profile.
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	Using 2024 as the baseline year, the Entity has established a documented GHG reduction strategy and plan aligned with the 1.5°C warming scenario through the application of the ASI Reduction Pathway Tool. The strategy is supported by annual organisation-wide GHG inventories prepared in accordance with ISO 14064 and includes defined reduction actions and performance targets. The Entity has committed to reducing Product-related GHG emissions intensity from 6.23 t CO ₂ e/t in 2024 to 5.41 t CO ₂ e/t by 2028 and 4.80 t CO ₂ e/t by 2030, providing a structured pathway for emissions reduction and continuous climate performance improvement.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established medium- and long-term GHG reduction targets covering direct emissions and Material indirect emissions, supported by a documented GHG reduction strategy and pathway aligned with the 1.5°C warming scenario. The GHG Emission Reduction Pathway targets a decrease in Product-related GHG emissions intensity from 6.23 t CO₂e/t in 2024 to 5.41 t CO₂e/t by 2028 and 4.80 t CO₂e/t by 2030. The current GHG Emissions Reduction Pathway, Reduction Plan, associated measures, and annual progress are available at: https://www.chinasnto.com/bocupload/202607/5.3%20Greenhouse%20Gas%20Emissions%20Reduction%20Plan.pdf Procedures have also been developed by the Entity to review and update the Reduction Pathway following any changes to the emissions baseline or reduction targets, ensuring the continued relevance and effectiveness of climate-related objectives and actions.
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented Management Systems, monitoring processes, and operational controls to support its GHG Emissions Reduction Strategy, plan, and targets. GHG emissions performance has been monitored through regular data collection, emissions quantification, and performance reviews, enabling the effectiveness of reduction measures to be evaluated and improvement opportunities identified. Climate-related objectives have been integrated into operational management practices, supporting continual progress towards the Entity's GHG Emissions Reduction Pathway and emissions reduction commitments.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has identified Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_x) as its primary air emissions and has disclosed information on key air pollutants and associated emission concentrations, available at: https://www.chinasnto.com/bocupload/202607/6.1&6.2%20Third-party%20Monitoring%20Report%20on%20Air%20+%20Water%20+%20Noise%20Pollution%20(Changde).pdf and https://www.chinasnto.com/bocupload/202607/6.1&6.2%20Third-party%20Monitoring%20Report%20on%20Air%20+%20Water%20+%20Noise%20Pollution%20(Changde).pdf

CRITERION	RATING	COMMENT
		<u>party%20Monitoring%20Report%20on%20Air%20+%20Water%20+%20Noise%20Pollution%20(Changsha).pdf</u> An air emissions management plan has been established and implemented to manage identified air emission risks and maintain compliance performance. As pollutant emission levels remain significantly below applicable regulatory limits, priority has been assigned to the operation, monitoring and maintenance of pollution control Facilities to prevent abnormal releases and increases in emissions. The air emissions management plan and associated control measures are reviewed periodically and updated in response to changes in Material air emission risks, supporting the ongoing effectiveness of air emissions management.
6.2a-g Discharges to Water	Conformance	The Entity's Aluminium casting, rolling and Aluminium foil manufacturing processes do not generate process wastewater. Based on annual monitoring and publicly disclosed water pollutant discharge data, discharges are limited and associated environmental impacts are considered negligible. The Entity has established and implemented a water pollutant management plan focused on maintaining existing controls and preventing abnormal pollutant discharges under non-routine operating conditions. Water pollutant discharge performance and management measures are available at: <u>https://www.chinasnto.com/bocupload/202607/6.2%20Water%20Pollutant%20Management%20Annual%20Report.pdf</u> The management plan is periodically reviewed and updated to address changes in water-related risks and identified control deficiencies, supporting the continued effectiveness of water pollution management.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established and implemented procedures to identify, assess and manage risks associated with Spills and Leakages that could affect air, water and land. Risk assessment findings, preventive controls and emergency response arrangements have been documented, available at: <u>http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</u> Regular inspections and monitoring are conducted to identify potential sources of Spills and Leakages and support timely corrective action where necessary. Management measures, monitoring arrangements and emergency response plans are periodically reviewed and updated in response to changes in operational risk profiles or identified control deficiencies, supporting the Spills and Leakages prevention and management.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established procedures for reporting, managing and disclosing Spills and Leakages through its Environmental Protection Management Procedure and Emergency Response Plans. No Spill or Leakage incidents have been recorded since the Entity joined ASI. Risk assessments and emergency response arrangements for Spills and Leakages, including processes for impact assessment, response and reporting, are available at: <u>http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</u>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity has established and implemented a Waste management strategy within its Environmental Management System, consistent with the Waste Mitigation Hierarchy. Hazardous Waste and Non-Hazardous Waste generated from operations are quantified and available at: http://www.chinasnto.com/bocupload/202607/6.5%20Solid%20and%20Hazardous%20Waste%20Report.pdf The Entity has evaluated the environmental impacts of Waste generation and implements measures to minimise these impacts through Waste reduction, reuse and recycling initiatives. Hazardous Waste is managed and disposed of in accordance with applicable legal requirements, supporting effective Waste management and resource efficiency across its operations.
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 system to collect and reuse Aluminium Dross. The Entity reviews Dross reuse activities monthly, with Dross residues used by other Entities in Products including as building material. Annual onsite inspections of Dross reuse companies are conducted to ensure Dross is not inappropriately disposed. The Entity has also developed a plan to increase Aluminium recovery from Dross residues and the reuse of processed Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified, measured and documented water withdrawal and use by source and type and assessed water-related risks within its Area of Influence. The assessment considered local water conditions, water withdrawal and discharge activities, and the effectiveness of existing management measures. The results indicate that water-related risks are low, with no significant risks identified within the Entity's Area of Influence. Water-related assessment information, including the water balance and water risk assessment, is available at: http://www.chinasnto.com/bocupload/202607/7.1&7.2%20Water%20Resources%20Risk%20Assessment%20Report%20&%20Management%20Plan.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's water-related risks are identified and assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A qualified third party has conducted an Environmental Impact Assessment (EIA), including an assessment of Biodiversity and Ecosystem Services risks and impacts, which was approved by the relevant regulatory authority. Biodiversity and Ecosystem Services risks within the Entity's Area of Influence were evaluated through the EIA and supporting risk assessments. The assessments identified no Biodiversity-sensitive areas within the Entity's Area of Influence. The Entity operates within a government-designated industrial zone and maintains environmental controls appropriate to its activities. Overall Biodiversity and Ecosystem Services risk is considered low.

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable to the Entity, as the identified risks and potential impacts have been assessed and documented as low. No Priority Ecosystem Services were identified in the Environmental Impact Assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has assessed the risks associated with Alien Species and implemented control measures for identified high-risk areas. An inventory of alien and/or invasive species is maintained, and a management plan has been implemented to proactively prevent the accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. Training on Alien Species management has been provided to Workers and contractor personnel, with an annual management review conducted to assess its effectiveness.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed through its ASI Performance Standard Management Manual, not to explore or develop New Projects or make Major Changes in World Heritage Properties. No World Heritage Properties are located within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has committed through its ASI Performance Standard Management Manual, to protecting the environment. The EIA Report, approved by the local Environmental Protection Agency, indicates that there are no Protected Areas within the Entity's Area of Influence.
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 implemented a Policy committing to respect Human Rights, including Gender Equity, and has communicated the Policy to all employees. The Policy is available at: http://www.chinasnto.com/bocupload/202607/9.1%20Human%20Rights%20Policy%20Commitment.pdf The Entity has established and implemented a Human Rights Due Diligence process and mapped Affected Peoples and Organisations. Human Rights risks have been identified and assessed, and a control plan for Human Rights impacts has been established and implemented. The Entity's Human Rights Due Diligence process is reviewed during the annual Management review.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented Policies to respect women's rights and a programme to promote gender equity and women's empowerment throughout the employment process. No complaints have been received from female Workers. Interviews undertaken during the Audit with female Workers confirmed their awareness of their rights, with no

CRITERION	RATING	COMMENT
		negative feedback reported. The Entity has assessed its gender equity and women's empowerment programme and disclosed the assessment report at: http://www.chinasnto.com/bocupload/202607/9.2%20Report%20on%20the%20Effectiveness%20of%20Gender%20Equality%20Measures.pdf
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 processes to identify and assess potential impacts on cultural heritage and sacred sites through its environmental and social assessments. Environmental Impact Assessments (EIAs) and social assessments have been conducted for all projects within the Certification Scope. The assessments identified no cultural heritage or sacred sites within the Entity's Area of Influence. Procedures have been established to assess and manage potential impacts if such sites are identified through future project developments or operational changes.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it does not have projects that have caused or require resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a Stakeholder engagement process to identify and address the primary concerns of Affected Peoples and Organisations. The Entity has developed relevant plans to respond to these concerns. The plans are reviewed annually, with necessary improvements identified and implemented as required. The most recent plan is available at: https://www.chinasnto.com/bocupload/202607/9.7%20Plans%20to%20prevent%20and%20reduce%20negative%20Impacts%20on%20Neighbouring%20Stakeholders%20(Public%20Version).pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Policy prohibiting the use of conflict minerals and implemented an appropriate Management System. Training has been provided for all relevant employees, and the Policy and related requirements have been communicated to suppliers.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity has conducted a supply chain risk assessment and requires suppliers to complete a Responsible Mineral Due Diligence Management Form to determine whether materials originate from Conflict-Affected and High-Risk Areas (CAHRAs). The latest risk assessment of CAHRAs however, is inadequate, as it does not include a smelter supplying primary Aluminium to the Entity.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's internal assessment indicates that no materials are sourced from CAHRAs. A strategy has been established to respond to any risks identified in the future. The Entity has also conducted Due Diligence monitoring of its Aluminium supply chain. The risk identification and assessment concluded that no raw materials are sourced from CAHRAs, the overall risk is low, and no further action is currently required.
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, which fully addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity's ASI Performance Standard Management Manual defines the requirement for annual public reporting on the performance of supply chain Due Diligence regarding CAHRAs. The report on performance of supply chain Due Diligence is available at: http://www.chinasnto.com/bocupload/202607/9.8%20Responsible%20Procurement%20Annual%20Report.pdf
9.9 Security practice	Conformance	The Entity has implemented a security Policy that addresses Human Rights. Security guards are trained in their rights and responsibilities, including respecting internal and external Stakeholders and Workers. Their responsibilities and authorities are limited to personnel safety and property protection, vehicle management, and visitor registration. Body searches and restrictions on Workers' movement are prohibited. All security activities must be conducted in a manner that respects Human Rights. Specific training is provided to security guards, and no complaints regarding security activities have been received.
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. The Entity has a Policy respecting Freedom of Association, and an employee representative committee has been established. Employee representatives are freely elected by Workers.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of association for Workers through an employee representative committee. Representatives are freely elected by Workers and hold meetings with Management to address and manage employee concerns.
10.2a Child Labour	Conformance	There is no Child Labour or employment of underage Workers at the Entity. At the time of the Audit, the youngest Worker is 19 years old.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking. The Entity is committed to preventing Forced

CRITERION	RATING	COMMENT
		Labour, slavery and Human Trafficking and expects its suppliers to comply with these requirements. Worker and management interviews, document reviews and site observations confirmed that the Entity neither engages in nor supports Forced Labour. Workers are hired directly by the Entity and are not required to pay any employment-related fees or deposits. The Entity does not provide loans to Workers, and Workers retain their identity documents. The Entity respects Workers' freedom of movement and imposes no unreasonable restrictions. Workers may freely terminate their employment with appropriate notice. The Entity has prepared and disclosed a 2025 Modern Slavery Statement, available at: http://www.chinasnto.com/bocupload/202607/10.3%20Statement%20Against%20Modern%20Slavery.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to preventing Discrimination, and no cases of Discrimination were reported or identified during the Audit. Recruitment advertisements and training, promotion and termination records indicate that decisions are based solely on candidates' ability to meet job requirements, rather than personal characteristics. The Entity provides training on Discrimination to promote a culture of non-Discrimination. Payroll records demonstrate equal pay for equal work. Workers interviewed during the Audit confirmed that they are treated equally within the Entity.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication channels with Workers and Worker representatives. Workers can raise complaints and concerns regarding working conditions and the resolution of workplace and compensation issues without fear of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented a Policy prohibiting all forms of Violence and Harassment. As part of its risk management processes, and with Worker participation, the Entity has identified and assessed the risks of Violence and Harassment and established and implemented control measures to prevent their occurrence. Training has been provided to all Workers, who are informed of the procedures for reporting cases. No cases of Violence or Harassment have been reported or identified at the Entity in the past three years. The Policy is reviewed during the annual Management review meeting, or following any major Business change or the identification of a control gap. The Entity's Policy on Violence and Harassment, is available at: http://www.chinasnto.com/bocupload/202607/10.6%20Policy%20Against%20Violence%20and%20Harassment.pdf
10.7a-c Remuneration	Conformance	The Entity ensures that labour contracts are established with all employees within one month of commencing work. The terms and conditions of employment comply with the requirements of the Labour Contract Law. The wage structure is clearly defined, the basic wage exceeds the legal minimum wage, and total remuneration meets Workers' basic needs. Overtime is paid in accordance with legal requirements, at more than 150% of the regular wage for Overtime on working days, 200% for weekend work and 300% for public holidays. Wages are paid on time and without delay.

CRITERION	RATING	COMMENT
10.8a-c Working Time	Conformance	Working hours are recorded using a fingerprint-scanning timekeeping system. Regular working hours are 40 hours per week, five days a week. Working hours are monitored, and monthly Overtime hours do not exceed the legal limit. At least one day off per week is guaranteed. The Entity provides leave to eligible Workers in accordance with Applicable Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights through orientation training, the provision of an Employee Growth Manual and on-site noticeboards.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented and maintained an Occupational Health and Safety (OH&S) Management System certified to ISO 45001:2018 across its Facilities. The OH&S Management System incorporates key elements, including organisational context, leadership and Worker participation, planning, support, operation, performance evaluation and continual improvement. The system has been implemented and maintained to support the identification and control of workplace hazards, the provision of safe and healthy working conditions, and continual improvement in OH&S performance.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has conducted periodic reviews of its Occupational Health and Safety (OH&S) Management System through established mechanisms, including monthly safety meetings, annual legal compliance evaluations, internal audits and Management reviews. The effectiveness of the OH&S Management System is regularly assessed, and appropriate corrective and preventive actions are implemented where actual or potential control deficiencies are identified to support continual improvement. The OH&S Management System and associated controls are reviewed and updated in response to significant changes in OH&S risks or operational conditions. The Entity has disclosed information on OH&S performance, including leading and lagging indicators, and with comparative analyses against industry performance and relevant leading practices, available at: http://www.chinasnto.com/bocupload/202607/11.1%20Operation%20of%20the%20OH&S%20Management%20System%20Reprot.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established Environment, Health and Safety (EHS) Committees at its Facilities to provide a structured mechanism for Workers and management to raise, discuss and address OH&S matters. The Committees meet regularly to review workplace Health and Safety performance, identify hazards and improvement opportunities, and support the implementation of corrective actions. Through ongoing Worker participation and engagement, the Committees contribute to the continual improvement of OH&S management practices and the promotion of a safe and healthy working environment across the Entity's operations.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 April 2019	Initial Certification Audit – Full Certification
1	13 June 2023	Re-Certification and Scope Change Audit – Provisional Certification. Scope Change to apply PS V3. Change of Audit Firm to TÜV SÜD.
2	2 May 2024	Surveillance Audit – Full Certification Correction to Rev 1 to include notice of approval for six month extension to the Certification Period due to a COVID-19 delay, resulting in expiry of 29 October 2022; Correction to Rev 1 Certification Period dates to 30 October 2022 – 29 October 2023 to reflect continuous period of Certification; Correction to Rev 1 Document Control table to reflect Rev 0 Date as 30 April 2019; Change of Audit Firm to DNV Business Assurance Services UK Ltd.
3	1 May 2025	Surveillance Audit
4	21 September 2026	Re-Certification and Scope Change Audit – Full Certification 'Material Conversion' removed from Supply Chain Activities. Change of member name to 'SNT0'.