ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Shandong Phoenix New Material Technology Co., Ltd.

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
588	PERFORMANCE STANDARD (V3.1 2023)	FULL CERTIFICATION	SGS-CSTC STANDARDS TECHNICAL SERVICES
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	30 OCTOBER 2026	29 OCTOBER 2029	30 OCTOBER 2026

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

Manufacturing of Aluminium alloy profiles (including photovoltaic and other industrial applications) at the Shandong Phoenix New Material Technology facility, located in Binzhou City, Shandong Province, China.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Shandong Phoenix New Material Technology Co., Ltd.
ENTITY NAME	Shandong Phoenix New Material Technology Co., Ltd.
CERTIFICATION SCOPE	Manufacturing of Aluminium alloy profiles (including photovoltaic and other industrial applications) at the Shandong Phoenix New Material Technology facility, located in Binzhou City, Shandong Province, China.
SUPPLY CHAIN ACTIVITIES	• Semi-Fabrication • Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	• 25 – 26 June 2026
AUDIT REPORT SUBMISSION	• 9 August 2026
AUDIT SCOPE	The Audit Scope included the manufacturing of Aluminium alloy profiles, including photovoltaic and other industrial applications at the at the Shandong Phoenix New Material Technology facility, located in Binzhou City, Shandong Province, China. Supply Chain Activities included in the Audit Scope: • Semi-Fabrication • Material Conversion 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	30 October 2026 – 29 October 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	29 October 2027
CERTIFICATE NUMBER	588

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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

Shandong Phoenix New Material Technology Co., Ltd. (the 'Entity') is an Aluminium processing and photovoltaic component materials manufacturer located at the southeast corner of the intersection of Yuehe 6th Road and Huixian 4th Road, Gaoxin Street, Zouping City, Binzhou City, Shandong Province, China.

The production process comprises of Aluminium rod heating, sawing, extrusion, aging treatment, straightening, cutting, shot blasting, surface oxidation, cleaning, deep processing, packaging, and storage. The oxidation process includes sulfuric acid-based degreasing and electrolytic oxidation, followed by nickel acetate sealing and multiple cleaning stages.

The Entity currently has an annual production capacity of approximately 60,000 tonnes. Its operations are focused primarily on the domestic solar photovoltaic supply chain, providing processed Aluminium frame Products for photovoltaic module applications.

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	Low	Medium	MEDIUM
RISKS	Low	Low	Low	LOW
PERFORMANCE	Medium	Low	Low	LOW
OVERALL		LOW		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has established and regularly updates a register of Applicable Law, regulations and other requirements relating to the environment, Occupational Health and Safety, and Human Rights. On-site verification during the Audit confirmed that the Entity holds a valid Business licence. Online searches also identified no violations by the Entity. Relevant environmental impact assessment documents however, remain registered under Shandong Lide New Energy Technology Co., Ltd., and the ownership transfer procedures have not yet been completed.
1.2 Anti-Corruption	Conformance	The Entity has established an anti-Bribery Management System and disclosed its Complaints Resolution Mechanism, including a 'whistleblowing' hotline and email address. Employees have received relevant training, and employees in key sensitive positions have signed anti-Bribery commitments with the Entity. The anti-Bribery Policy has also been communicated to relevant Stakeholders. A search of public credit information website identified no cases of Bribery involving the Entity.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct addressing principles relevant to environmental, social and governance performance, which has been approved by senior management. The Code of Conduct is available at: https://www.sdfhxc.cn/announcements/a0f30db9-00ea-4246-988c-ec2544b67bb9 The Entity has conducted annual ASI internal audits and management reviews to ensure the effective operation of its Management System.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has developed and implemented Environmental, Social and Governance (ESG) Policies addressing environmental protection, governance, social responsibility and responsible procurement. The Policies are available at: https://www.sdfhxc.cn/announcements/16e95dc5-71e2-4959-a119-37b3e17b0227 Each Policy has been approved by the General Manager, communicated internally through training and reviewed annually. The Entity has not however provided evidence of external communication of its ESG Policies.
2.2a-c Leadership	Conformance	The Entity has appointed an Executive Vice President as its ASI Management Representative, with full responsibility and authority for ensuring Compliance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented a comprehensive Management System and holds ISO 14001:2015 certification.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management Manual developed in accordance with SA8000:2014, to manage risks relating to Human Rights and labour rights.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a responsible procurement Policy addressing ESG issues and provided evidence of its internal and external communication. The Policy is available at: https://www.sdfhxc.cn/announcements/c002a960-fe95-4bdb-962a-20a9ccc9f226
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or made Major Changes to its existing Facilities since joining ASI in 2026.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or made Major Changes to its existing Facilities since joining ASI in 2026. The Entity has however, established a Human Rights Impact Assessment Management Procedure and completed Human Rights Impact Assessments for existing projects. The assessment reports are available at: https://www.sdfhxc.cn/announcements/d6b7441f-646e-4cef-9d72-69b06f7f83e8
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Environmental Emergency Response Plan, comprising a comprehensive emergency plan and a specific plan for environmental emergencies. It has submitted an application to register its Production Safety Accident Emergency Plan, conducted drills as scheduled and evaluated their effectiveness. The emergency plans are available on the Entity's website at: https://www.sdfhxc.cn/announcements/53d5629d-7a84-40bc-a9b0-3b5e1d09878e
2.8a-d Suspended Operations	Conformance	The Entity has established and implemented a Suspended Operations Management Regulation and a Business Resilience Plan. No changes to the Business or control gaps have been identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for reviewing ESG issues as part of the Due Diligence process for mergers and acquisitions. To date, the Entity has not undertaken any mergers or acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established procedures for reviewing ESG issues during the planning of closures, decommissioning and divestments. To date, the Entity has not undertaken any closures, decommissioning or divestments.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published its 2025 Sustainability Report, available at: https://www.sdfhxc.cn/announcements/09103052-b897-44a2-bcf1-12a7eac05901
3.2 Non-compliance and Liabilities	Conformance	The Entity discloses information on substantial fines, judgments, penalties and non-monetary penalties arising from violations of

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		Applicable Law in its ESG reports. To date, no fines or judgments have been imposed on the Entity.
3.3a-c Payments to Governments	Conformance	The Entity pays taxes to the government in accordance with Applicable Law and has no other reportable payments. The tax payment certificate is available at: https://www.sdfhxc.cn/announcements/2960db28-9115-4873-a43c-7ccce94a21e7
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established procedures for managing complaints and appeals from relevant parties, including mechanisms for handling employee grievances. The Complaints Resolution Mechanism is legitimate, accessible, predictable, fair, transparent, rights-compatible and based on continuous learning, participation and dialogue. It is designed to address complaints, appeals and information requests from Affected Peoples and Organisations regarding the Entity's operations. The mechanism is available on the Entity's website at: https://www.sdfhxc.cn/announcements/31a17545-cc2f-41d2-81c2-57dd60e65c6d
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established and implemented a Product Life Cycle Assessment Management Procedure and provided relevant training to ensure its implementation. It has also conducted a Life Cycle Assessment (LCA), available at: https://www.sdfhxc.cn/announcements/4ff69229-814d-4b50-b532-5849b1c4ea93
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity has established and implemented a Product Life Cycle Assessment Management Procedure and provided training to ensure its implementation. It has conducted an LCA, available at: https://www.sdfhxc.cn/announcements/4ff69229-814d-4b50-b532-5849b1c4ea93 . The material emissions assessment did not, however, use measured data or supplier-specific actual values, resulting in insufficient accuracy. The Entity has acknowledged these deficiencies, consulted the service provider and is currently planning to reassess the calculation results.
4.2 Product Design	Conformance	The Entity reduces Process Scrap through measures including the use of ultra-thin saw blades, fitting transport equipment with felt to prevent collisions, minimising clamping and using nitrided moulds to improve Product yield. Currently, Aluminium shavings are compressed and sent to suppliers for metal recycling, together with rejected Products and Scrap.
4.3a-b Aluminium Process Scrap	Conformance	The Entity reduces Process Scrap through improving production technology, including using ultra-thin saw blades, lining transport equipment with protective felt to prevent collisions, minimising clamping and using nitrided moulds to improve Product yield. Currently, Aluminium shavings are compressed and sent to suppliers for metal recycling, together with rejected Products and Scrap.

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		The Entity's Aluminium Process Scrap Management Procedure classifies Process Scrap into three categories: white Scrap, oxidised Scrap and Aluminium chips, to facilitate reuse.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has established a strategy for recycling and reusing Aluminium Scrap. The strategy is available at: https://www.sdfhxc.cn/announcements/8e42ab13-5481-4100-8741-422153472fc4 The strategy however lacks sufficient detail and comprehensiveness.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has signed a recycling agreement with the assembly plant to promote the recycling and reuse of Waste frames. As photovoltaic modules typically have a design life of 25–30 years, the Entity is also exploring recycling solutions for end-of-life Products.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has established a Greenhouse Gas (GHG) Inventory Management Procedure and regularly conducts GHG inventories for both its organisational and operational boundaries. It also reviews its GHG emission reduction plans and decarbonisation pathways in response to changes in its Business. The Entity has disclosed its energy consumption on pages 11–12 of its Sustainability Report, available at: https://www.sdfhxc.cn/announcements/09103052-b897-44a2-bcf1-12a7eac05901 The Greenhouse Gas Verification Statement is available at: https://www.sdfhxc.cn/announcements/637b0537-760b-4260-8c06-e2b0b7d8bc55 On-site verification undertaken during the Audit identified that the Entity did not, however, use the official national grid emission factor when accounting for Greenhouse Gas emissions from purchased electricity. There are inconsistencies between the total Greenhouse Gas emissions reported in the GHG report and data disclosed in the Sustainability Report.
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	Minon Non-Conformance	The Entity has developed a GHG Emissions Reduction Plan covering direct and indirect emissions, using its 2025 GHG emissions data as the baseline. The plan targets Scope 3 Category 1 emissions from purchased Aluminium and Scope 1 and Scope 2 process emissions. The Reduction Pathway aligns with the 1.5°C scenario and adopts the ASI pathway method. The Entity's GHG Emissions Reduction Plan is available at: https://www.sdfhxc.cn/announcements/30270a3a-9f8e-4bc5-b215-153b4ef51da2 The emission factors used in the GHG inventory are however inaccurate, resulting in discrepancies in the underlying data used to

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		assess alignment with the 1.5°C scenario. The Entity shall recalculate its GHG reduction plan using the correct emission factor and reassess whether the plan aligns with the 1.5°C scenario.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minon Non-Conformance	The Entity has developed a GHG Emissions Reduction Plan with short-, medium- and long-term targets and evaluates progress towards these targets annually. The Plan is available at: https://www.sdfhxc.cn/announcements/30270a3a-9f8e-4bc5-b215-153b4ef51da2 The Entity has however used inappropriate emission factors in its GHG inventory, resulting in discrepancies in the underlying emissions data used to set reduction targets, model the medium-term emission reduction pathway and assess annual progress.
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an Energy Management System to improve energy efficiency and reduce GHG emissions and has obtained Energy Management System certification. The Entity has also developed procedures defining Greenhouse Gas inventory and verification requirements and established a GHG Inventory Implementation Committee to conduct regular energy monitoring and disclose implementation progress.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has developed an environmental monitoring plan and a pollutant emission reduction plan and obtained a pollutant discharge permit. The emission reduction plan is reviewed annually and whenever internal or external emission limits are exceeded or changes to the Entity's operations affect the main risks associated with atmospheric pollutant emissions. To date, no exceedances or relevant operational changes have occurred. The Entity's Air Pollutant Emission Reduction Plan is available at: https://www.sdfhxc.cn/announcements/860bb32b-05a8-447e-8196-e7c954276c0f
6.2a-g Discharges to Water	Conformance	The Entity's production wastewater consists of both alkaline and acidic wastewater generated during manufacturing and undergoes neutralisation, alkali addition, flocculation and sedimentation before being discharged into the municipal sewage network once it meets applicable discharge standards. The Entity reviews its emission reduction plan annually and whenever internal or external emission limits are exceeded, or operational changes affect the main risks associated with pollutant emissions. To date, no exceedances or relevant operational changes have occurred. The Entity's Water Pollutant Emission Reduction Plan is available at: https://www.sdfhxc.cn/announcements/97eb8753-e601-4ffb-85c5-977e5900df40
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	The Entity has established Spills and Leakages management procedures that identify and assess key areas where air, water and/or land pollution may occur during its operations. The procedures require annual review and further reviews following any Spills or Leakage incident, operational changes that affect the main risks, or identified control deficiencies. To date, no relevant changes or control

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		deficiencies have been identified. Interviews with on-site personnel indicated that the risk of environmental pollution from Spills and Leakages is relatively low. The Entity could not, however, provide an assessment report nor any public disclosure of these procedures.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity commits to disclosing information on Spills and Leakages incidents, their root causes and the remedial measures taken annually. To date, the Entity has not experienced any Spill or Leakage incidents since joining ASI.
6.5a-c Waste Management and Reporting	Conformance	The Entity has developed and implemented Solid Waste Management Procedures and provided training for relevant personnel. General Waste and recyclable materials are sold to purchasing stations, while domestic Waste is handled by the municipal environmental sanitation department. Hazardous Waste is managed through the solid Waste treatment platform, with a treatment agreement developed with the authorised Hazardous Waste treatment provider. The Entity also provides Waste transfer receipts. The quantities of Hazardous Waste and Non-Hazardous Waste generated, together with the corresponding disposal methods are disclosed in the ESG report, page 8, available at: https://www.sdfhxc.cn/announcements/09103052-b897-44a2-bcf1-12a7eac05901 The Entity's current approach focuses on conserving oil and minimising Waste oil generation. Waste oil is reused for equipment lubrication and rust prevention wherever practicable, thereby reducing the amount of Hazardous Waste generated and disposed of.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has established a Water Resources Management and Control Procedure defining its water conservation responsibilities and management requirements. Verification confirmed that all water is sourced from the municipal water supply, with no other sources of water intake; therefore, water withdrawal equals water use. The Entity's annual water withdrawal is below 500,000 m^3. Furthermore, the Environmental Impact Assessment (EIA) report and water resource risk assessment report classify the groundwater environment as insensitive and the water resource risk as low. The water resource risk assessment is available at: https://www.sdfhxc.cn/announcements/01c5fd54-82f9-4416-aa6d-550ce56a3db6 The Entity has disclosed its water consumption data in its Sustainability Report, page 8, available at: https://www.sdfhxc.cn/announcements/09103052-b897-44a2-bcf1-12a7eac05901

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water-related risks within its Area of Influence have been assessed as low. Interviews undertaken during the Audit confirmed that there have been no significant changes to the Entity's operations and no control deficiencies have been identified. Despite the low water risk, the Entity monitors water quality annually, and all test results comply with the applicable standards.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has developed a Biodiversity Assessment Report covering its geographical location, topography, engineering and hydrological conditions, climate, soil, vegetation, minerals, social environment and Biodiversity risks. The assessment concluded that the Biodiversity risk is low. The Entity has not identified any adverse impacts on Ecosystem Services.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impacts on Biodiversity or Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment did not identify significant risk or impacts on Biodiversity or Ecosystem Services.
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 prepared an Alien Species Risk Assessment Report, a list of invasive Alien Species in China and a list of flora species on its premises. The risk assessment concluded that the risk of invasion by Alien Species is low. To date, there have been no unintended or deliberate introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to prohibiting entry into any World Heritage Site. The industrial buildings leased by the Entity were planned and constructed by Government departments and are not located within World Heritage Sites.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as the assessment confirmed that the Entity is not located within a Protected Area for flora and fauna.
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 Policy outlining its commitments to protecting Human Rights. The Policy has been approved by the General Manager, published on the Entity's website

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		and communicated to relevant parties through Human Rights Policy briefings and email. The Policy is available at: https://www.sdfhxc.cn/announcements/4d6b95fb-b826-4382-bd22-c1624480dfed The Entity reviews its Human Rights Policy every three years.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a Women's Rights Protection Policy and Female Employee Protection Management and Control Procedures, which set out commitments and measures to promote gender equity and protect women's rights. The Entity defines women's legitimate rights and implements control measures to safeguard them. The effectiveness of its gender equity measures has been assessed in the Gender Equality Survey Report, available at: https://www.sdfhxc.cn/announcements/09103052-b897-44a2-bcf1-12a7eac05901
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 committed to protecting cultural and sacred heritage. It is located within an industrial park planned and developed by the local Government, where no cultural or sacred heritage issues have been identified.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no presence of Indigenous Peoples or their lands, territories and resources has been identified, and no Cultural and Sacred Heritage Sites have been identified.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has no projects requiring relocation or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects the legal and traditional rights of Affected Peoples and Organisations regarding their land, livelihoods and use of natural resources. It has developed and implemented a Community Engagement Plan to manage the health, safety, social, cultural, Human Rights and environmental impacts of its operations through the planning, implementation, monitoring, evaluation and continuous improvement of community engagement activities. The latest version of the Plan is available at: https://www.sdfhxc.cn/announcements/799375ae-6835-4fde-a1a5-861b46c6a833

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9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Minor Non-Conformance	The Entity has established a Responsible Supply Chain Policy and Risk Control Procedures for Conflict Minerals and Conflict-Affected and High-Risk Areas (CAHRAs), which define Due Diligence responsibilities and resource requirements for responsible mineral sourcing and set out the methodology for identifying and assessing CAHRAs. The relevant Policies have been communicated to suppliers via email and other channels. On-site verification of Aluminium rod suppliers' documentation undertaken during the Audit however indicated no evidence of the suppliers commitments to comply with relevant requirements.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Conflict Minerals Policy that defines Due Diligence responsibilities and resource requirements for responsible mineral sourcing and specifies the methodology for identifying and assessing CAHRAs. The Entity conducts Responsible Minerals Due Diligence on its Aluminium suppliers annually. The Entity has completed a mineral supply chain risk assessment, which concluded that none of the materials originate from CAHRAs and that the overall supply chain risk is low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as its existing risk assessment identified no risks of armed conflict or Human Rights violations within its supply chain.
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 has developed a 2025 Supply Chain Due Diligence Management Report, disclosing the results of its 'five-step' Due Diligence process. To date, no high-risk suppliers have been identified within the Entity's supply chain. The Mineral Supply Chain Due Diligence Management Report is available at: https://www.sdfhxc.cn/announcements/fa34ce2c-ac20-48af-a063-fcb459385c9d
9.9 Security practice	Conformance	The Entity has implemented Human Rights-compliant security measures. Its security management regulations require security personnel to respect Human Rights, and all security personnel have received training on relevant Human Rights requirements. To date, no security-related Human Rights violations have been reported.
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 it adheres to Applicable Law in China regarding Freedom of Association and Right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union and obtained legal person status for the Union. In August 2025, the Union members' representative assembly elected five committee members, including one woman. The Fund Supervision Committee comprises three members, including one woman, while the Female Workers' Committee comprises three female members. The Union has 35 representatives, including eight women and 27 frontline employees. All

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		employees are currently Union members. Employees have the right to join or leave the Union.
10.2a-c Child Labour	Conformance	The Entity has established a Policy prohibiting Child Labour and confirmed that no children or underage Workers are employed. At the time of the Audit, the youngest Worker is 19 years old. Under Chinese law, the employment of children is prohibited, while Workers aged 16 to 18 are subject to special legal protections and must not be assigned to hazardous work. There are currently no underage Workers employed by the Entity.
10.3a-c Forced Labour	Conformance	The Entity has prohibited Forced Labour. Document reviews and Worker interviews confirmed that all Workers have signed employment contracts and that the Entity has neither engaged in nor supports Human Trafficking, either directly or through employment or recruitment agencies. No evidence of unlawful wage deductions, debt bondage, debt repayment obligations or other forms of Forced Labour has been identified. The Entity's Declaration Against Modern Slavery is available at: https://www.sdfhxc.cn/announcements/20f653d1-08ef-4a1d-b26a-26fad9eba9a9
10.4a-c Non-Discrimination	Conformance	The Entity has established an anti-Discrimination Management System to promote equal opportunities and prevent Discrimination in recruitment, remuneration, promotion, training and dismissal. In accordance with International Labour Organization Conventions C100 and C111, the Entity prohibits Discrimination based on gender, race, nationality or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other status that may lead to Discrimination. The Entity is committed to providing equal treatment and opportunities for all Workers. To date, no cases of Discrimination have been reported.
10.5 Communication and engagement	Conformance	The Entity maintains direct and regular communication with Workers and their representatives to address issues relating to working conditions, the workplace and remuneration, without threats of retaliation, intimidation, Violence or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Complaints Resolution Mechanism for incidents of Violence and Harassment. It respects Workers' rights, ensures that disciplinary measures comply with Applicable Law and implements its Human Rights Policy, prohibiting Violence and inhumane treatment of Workers. Worker interviews undertaken during the Audit confirmed that no incidents of Violence or Harassment have been reported within the Entity. The Entity's Anti-Harassment and Anti-Abuse Management Procedures are available at: https://www.sdfhxc.cn/announcements/ab58c795-5c04-4e4a-aa14-1515357765cc
10.7a-c Remuneration	Conformance	The Entity has signed employment contracts with all Workers in accordance with applicable labour laws. It has established systems for managing wages, working hours, remuneration and payroll calculations, covering basic wages, performance-related pay, production incentives, high-temperature allowances and other bonuses and subsidies. The Entity's monthly comprehensive salary

CRITERION	RATING	COMMENT
		generally meets local minimum wage requirements. It has also provided all Workers with five types of social insurance and a housing provident fund. The Entity pays Overtime in accordance with applicable labour laws: 1.5 times the basic wage for Overtime on working days, two times for Overtime on rest days and three times for work on statutory public holidays. The implementation of Overtime is currently considered uncommon at the Entity The Entity pays the previous month's wages by bank transfer on the 20th of each month and provides Workers with payroll records. Interviews with Workers confirmed their understanding of working hours and Overtime pay arrangements. Workers interviewed during the Audit also confirmed that there have been no delays in wage payments.
10.8a-c Working Time	Conformance	All Workers in the Entity currently receive at least one day off per week. Logistics personnel have weekends off and work eight hours per day, while frontline personnel work two eight-hour shifts and take rotating or compensatory leave to ensure at least one day off per week. Attendance records covering June 2025 to May 2026 were reviewed, and interviews with 15 Workers undertaken during the Audit confirmed working arrangements.
10.9a-b Informing Workers of Rights	Conformance	The Entity has developed an Employee Handbook and employee rights management procedures. It communicates Workers' rights to Freedom of Association and Collective Bargaining through training sessions, regular meetings and other channels.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001:2018 and has obtained valid ISO 45001:2018 certification.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity reviews its OH&S Management System at least annually and whenever changes to its operations result in significant changes to OH&S risks. The Policy is also reviewed when signs of control deficiencies are identified. The Entity conducts annual internal and external audits, and no relevant operational changes or control deficiencies have been identified to date. The system documentation includes manuals, procedures and work instructions. The Report on the effectiveness of the OH&S Management System is available at: https://www.sdfhxc.cn/announcements/8bf232be-3732-4453-a7f1-dff91a4eb663 The report on the effectiveness of the OH&S Management System does not however include leading and lagging indicators or comparative analyses against industry performance and leading practice.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a Safety Committee comprising representatives, including frontline Workers, who participate in hazard identification and incident investigation and handling.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 October 2026	Initial Certification Audit – Full Certification