

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

LUOYANG WANJI ALUMINIUM PROCESSING CO.,LTD

CERTIFICATE
NUMBER

96

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

CHINA QUALITY
MARK
CERTIFICATION
GROUP

DATE OF ISSUE

29 SEPTEMBER 2020

DATE OF EXPIRY

28 SEPTEMBER 2023

CERTIFIED SINCE

29 SEPTEMBER 2020

AUTHORISED BY

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

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

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

CERTIFICATION SCOPE

Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main products include tank cover material, ring pulling Material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft package, medicine foil, etc. the main processes include rolling, straightening, trimming, annealing, slitting and packaging.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
ENTITY NAME	Luoyang Wanji Aluminium Processing Co.,Ltd
CERTIFICATION SCOPE	Luoyang Wanji Aluminium Processing Co.,Ltd. is located on Changjiang Avenue, industrial cluster area, Xin'an County, Luoyang City, Henan Province. The company's main products include tank cover material, ring pulling material, shutter, glass strip, aluminium foil blank, double zero foil, battery soft package and medicine foil. The main processes include rolling, straightening, trimming, annealing, slitting and packaging.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (29 – 31 July 2020)• Surveillance Audit (15 – 16 March 2022)
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">• 29 – 31 July 2020 (Initial Certification Audit)• 15 – 16 March 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 25 April 2022
AUDIT SCOPE	<p><u>Initial Certification Audit (29 – 31 July 2020)</u></p> <p>The Audit Scope covered related activities and Facilities involved in the production process of aluminium strip and aluminium foil products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (15 – 16 March 2022)</u></p> <p>The audit scope covered related activities and Facilities involved in the production process of aluminium strip and aluminium foil products.</p>

	<p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> • Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> • Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> ☑ 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	29 September 2020 – 28 September 2023
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	28 September 2023
CERTIFICATION NUMBER	96

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The General Management Department and the Safety and Environmental Protection Department are responsible for the identification of Applicable Laws and regulations. Evaluation of compliance in quality, environmental protection, work safety, Occupational Health and Safety, energy, labour law and social responsibility is undertaken at least once a year. Each department is responsible for communicating relevant requirements to all employees and ensuring compliance with them.
1.2 Anti-Corruption	Conformance	The Entity has developed an anti-bribery policy and established an anti-bribery risk assessment team which is led by the Vice President and representatives across various departments. The Entity has developed an anti-bribery risk assessment standard where risk consequences from bribery are identified, all of which have been rated as high risks. The Entity conducts the anti-bribery risk assessment at least once a year and the recent Anti-Bribery Review Report 2021 released in January 2022 concluded that anti-bribery work is generally effective across the Entity.
1.3 Code of Conduct	Conformance	The Entity has developed and implemented Codes of Conduct which include the environmental code of conduct, the social code of conduct and governance code of conduct. The Entity conducts an annual review in conjunction with internal audit and management assessment. The Entity conducts induction training for new employees and provides training for regular employees at least annually.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has developed and implemented environmental, social and governance Policies. The policy content supports ASI Performance Standard requirements and is related to the business of the Entity.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In January 2022, the General Manager appointed the Deputy General Manager as the ASI management representative to ensure resource support. In annual management review activities, the General Manager organises the review on the suitability of these Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has developed environmental, social and governance Policies. The Entity communicates its Policies to the public on its website at:

CRITERION	RATING	COMMENT
		http://wanji-al.bce206.lyqingfeng.cn
2.2 Leadership	Conformance	In January 2022, the General Manager appointed the Deputy General Manager as the ASI management representative to ensure resource support. In annual management review activities, the General Manager organises the review on the suitability of these Policies.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has obtained certification of its Environmental Management System in accordance with ISO14001:2015. The scope of certification includes production of aluminium alloy plates, strips and foils and related activities. The certificate is valid from 18 September 2021 to 19 September 2024.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has formulated the requirements of a social management system regarding Human Rights and labour rights and interests in its ASI Performance Assurance Manual, for management of the Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has stipulated relevant requirements for Responsible Sourcing. The Entity has established a Procurement Control Procedure, in which the Raw Material Supply Department conducts investigation and evaluation of suppliers prior to procurement, communicates with suppliers through procurement contracts or procurement ancillary Agreements, and thereafter re-evaluates suppliers on an annual basis in terms of the environmental, social and governance risks.
2.5 Impact Assessments	Conformance	The Entity has stipulated the relevant requirements for conducting environmental, social, cultural and Human Rights Impact Assessment of major changes in new projects or existing facilities, and has developed a Control Procedure for Environmental and Occupational Health and Safety Assessment of New Projects. The procedure details the requirements for the documentation of environmental impact and risk evaluation, including gender analysis, for new projects.
2.6 Emergency Response Plan	Conformance	The Entity has stipulated relevant requirements for the Emergency Response Plan.
2.7 Mergers and Acquisitions	Conformance	The Entity has stipulated relevant requirements for mergers and acquisitions. The Entity has also formulated a Merger and Acquisition Procedure, as well as the working procedures, including preparations before implementation, various possible risks, risk avoidance in transactions and other requirements.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has stipulated relevant requirements for closure, decommissioning and divestment. The Entity has also formulated the Control Procedure for Closure, Decommissioning and Divestment and the working procedures.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed its Sustainability Report 2021 which includes seven sections: public disclosure of data, main sustainability report, environmental performance index report, labour performance index report, human rights performance index report, social performance index report and product performance index report: http://www.wanjigroup.com/home-newsinfo-cid-27-id-4446.html
3.2 Non-Compliance and liabilities	Conformance	The Entity has provided information on non-compliance and liabilities, and publicly disclosed its governance practices in the Sustainability Report: http://www.wanjigroup.com/home-newsinfo-cid-27-id-4446.html
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that address Anti-Corruption requirements. This requirement has been met through the deployment of anti-corruption policies.
3.3b Payments to governments (disclosure – Bauxite Mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established a feedback and communication platform for Stakeholders on its website, made its contact information available to the public through billboard, and has received information inquiries, complaints and appeals from all parties. At the same time, the Entity also has set up a mechanism, with its specialised management department to track the requests and complaints of Stakeholders, and established an appropriate settlement mechanism.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has completed relevant requirements for environmental Life Cycle Assessment (life cycle impacts). The Entity has formulated the Control Procedures for Identification and Evaluation of Environmental Aspects and has developed and implemented policies, systems and processes that meet LCA requirements, and conducted LCA on its main products (aluminium strips and aluminium foils).

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented the Control Procedures for Identification and Evaluation of Environmental Aspects and has developed and implemented policies, systems and processes that meet Life Cycle Assessment (LCA) information requirements. The policy states that LCA will be conducted upon request. The company has conducted life cycle assessment for LCA of major products (aluminium foil) and aluminium strip (2022.2.23) to provide LCA information to customers.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented the Control Procedures for Identification and Evaluation of Environmental Aspects and has developed and implemented policies, systems and processes that meet these Life Cycle Assessment (LCA) information requirements. The policy states that the Entity will release the LCA information in public. The Entity provides LCA information of the main products of aluminium foil and aluminium plate to customers via the website: http://www.wanjigroup.com/home-news-cid-27.html
4.2 Product design	Conformance	The Entity has developed a Control Procedure for Design and Development, and established Life Cycle Assessment (LCA) procedures during the product design process. Energy, consumption, emissions to water, emissions to air, waste and other environmental impacts are considered in LCA. For new products or product lines and upgrades to existing products or product lines, material or process technologies are considered to improve waste tolerance while maintaining material performance and quality.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established clear targets for Aluminium Process Scrap, which are distributed to each process and reviewed on a monthly basis.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established relevant requirements for the classification and separation of Aluminium Process Scrap.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	The Entity has developed relevant requirements for the collection and recycling of Products at end-of-life.
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	The Entity has developed relevant requirements for the collection and recycling of Products at end-of-life.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has developed and implemented relevant requirements for the disclosure of GHG emissions and energy use. The Entity conducts verification activities on GHG emissions annually and publicly discloses key GHG emissions and the use of various energy sources. Total GHG emissions , including the methods used for GHG emissions calculation and energy use (according to its sources) are publicly disclosed in the GHG Emission Report, available on the website: http://www.wanjigroup.com/home-newsinfo-cid-27-id-4442.html
5.2 GHG emissions reductions	Conformance	The Entity has developed and implemented relevant requirements for GHG emissions reductions. The Entity has developed a 'Greenhouse gas emission reduction Plan' for 2021, which specifies specific actions and deadlines for implementation, including responsible personnel and production sectors: http://www.wanjigroup.com/home-newsinfo-cid-27-id-4442.html
5.3a Aluminium Smelting (Management System)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has identified the relevant requirements for Emissions to Air and operates in accordance with its Pollutant Discharge Permit. Emissions of physical air pollutants are tested by a third party and confirmed to be below prescribed limits.
6.2 Discharges to Water	Minor Non-Conformance	The Entity has developed and implemented relevant requirements for Discharges to Water. The Entity has developed both a Water Management Procedure and Pollutant Emission Reduction Plan which specifies the annual goal of reducing water pollutants. By 2025, the external discharge rates target a reduction of more than 50%. The Entity however has not set an appropriate baseline and the measures do not specify the responsible department and actions required.
6.3a Assessment and Management of Spills and Leakage (assessment)	Minor Non-Conformance	When any leakage occurs at the Entity, it shall be classified according to the risk grade (emergency plan) and actions implemented according to the plan for different risk types.

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		The Entity has developed an Emergency Plan for Environmental Emergencies. Whilst the emergency drill plan for 2021 and 2022 is provided, it does not include any environmental emergencies arising from Spills or Leakage associated with the storage and use of rolling oil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has not had a Spill or Leakage incident. It uses a third party (Luoyang Liming Testing Service Co., Ltd.) to test the soil at the facility each year.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has identified relevant requirements for the reporting of Spills. The Entity has not had a Spill accident.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has identified relevant requirements for the reporting of Spills. The Entity has not had a Spill accident.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and maintained the Waste Management Procedure and Hazardous Waste Management Plan to collect and dispose of all wastes, as well as the Plan for Reducing the Hazard of Hazardous Waste and Measures for Reducing the Discharges and Hazard of Hazardous Waste. The competent authority monitors the Entity's implementation of the plans and measures on a quarterly basis.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has determined relevant requirements for waste management and reporting in the Waste Management Procedure, formulated according to the waste management strategy which is designed using the Waste Mitigation Hierarchy. The waste management strategy includes sustainable and comprehensive control measures to mitigate the adverse effects caused by waste generation, management (including storage and handling), treatment, transportation and disposal.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has stipulated relevant requirements for water assessment and developed the Water Management Procedure. The Entity in the environmental impact assessment of a construction project engages a qualified third party for hydrological studies and the present situation of water supply evaluation in the region illustrates the Entity conforms to the requirements of Applicable Law.
7.1b Water assessment (risk assessment)	Conformance	The Entity has stipulated relevant requirements for water assessment and developed the Water Management Program. The Entity analyses the water quality on a weekly basis for pH, hardness, alkalinity, chloride, concentration ratio and conductivity.
7.2a Water management (management plans)	Minor Non-Conformance	The Entity has developed and implemented Water Resources Management Goals and Plans, which sets the annual target of continuous reduction of water consumption, estimates that water consumption per ton

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		of products will be reduced and formulates the plan to achieve these goals. However, the planned water consumption for 2022 of 1.14 m ³ /ton is higher than the established target of 1.0 m ³ /ton.
7.2b Water management (monitoring)	Conformance	The Entity has developed an annual goal of continuously reducing water consumption and a plan to achieve the goal. Economic analysis meetings are held monthly to monitor the implementation of the plan.
7.3 Disclosure of water usage and risks	Conformance	Information including water use risks is published by the Entity on the website of the Wanji Group company. As the Entity's production water is recycled without discharge after being treated by the wastewater treatment station, there is no risk of pollution.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity issued the Biodiversity Assessment Report 2021, which includes the risks of impacts of land use and business activities on biodiversity, in combination with the monitoring of environmental greening in the Acceptance And Monitoring Report on Environmental Protection of Completed Construction Projects, conducted by a third party.
8.2a Biodiversity management (Biodiversity Action Plans)	Conformance	The Entity has determined the relevant requirements for biodiversity management via the Biodiversity Assessment Report 2021, which includes the Biodiversity Improvement Plan, approved by the General Manager.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Conformance	The Entity has determined the relevant requirements for biodiversity management via the Biodiversity Assessment Report 2021, which includes the Biodiversity Improvement Plan with the actions for implementation and the timeframe defined.
8.2c Biodiversity management (reporting)	Conformance	The Entity has determined the relevant requirements for biodiversity management via the Biodiversity Assessment Report 2021, which includes Biodiversity Improvement Plan. These requirements are published by the Entity on the website of the Wanji Group Company: http://www.wanjigroup.com/home-newsinfo-cid-27-id-4441.html
8.3 Alien Species	Conformance	The Entity has determined the relevant requirements for Alien Species in its ASI Performance Assurance Manual, including evaluating and controlling the risk of introducing Alien Species during operational activities.

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8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (Policy)	Conformance	The Entity has determined the relevant requirements for Human Rights Due Diligence and formulated the Human Rights Due Diligence Procedures. The Entity commits to respect Human Rights and establish a Human Rights Policy of respecting the civil rights of employees and eradicating discrimination.
9.1b Human Rights Due Diligence (Process)	Minor Non-Conformance	The Entity has determined the relevant requirements for Human Rights Due Diligence and formulated the Human Rights Due Diligence Procedures which outline the methods of identifying, preventing, mitigating and explaining the actual and potential impacts of the Entity’s actions on Human Rights. Recent meetings held at the Entity illustrate however that this process has not been transparent with limited discussion with employees on site occurring during 2022.
9.1c Human Rights Due Diligence (remediation)	Minor Non-Conformance	The Entity is committed to observing and respecting Human Rights, and no adverse human rights impact have occurred. If adverse human rights effects are found to have been caused or contributed to during the due diligence process, the Entity will remedy the situation through due diligence procedures, however these are not described in the Human Rights Due Diligence Procedures.
9.2 Women’s Rights	Conformance	The Entity has determined the relevant requirements for women’s rights and interests and formulated the Procedures for the Protection and Management of Female Employees. Implementation of the procedures can ensure respect for women’s rights and interests, eliminate Discrimination against women, and guarantee women’s Human Rights equal with those of men, including the right to vote and stand for election, the right to health, equal access to education, decision-making role in the Entity, equal pay for equal work,

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		protection from sexual abuse and equal opportunities to compete.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as no cultural and sacred heritage is affected by the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlement is necessary, no local residents are affected by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlement is necessary, no local residents are affected by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity has determined the relevant requirements for Local Communities and has developed the Related Party Management Program. The Entity respects legal and traditional rights and interests of Local Communities in their land, livelihood and use of natural resources, and takes appropriate steps to prevent and solve adverse impacts of its activities on the livelihood of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has determined the relevant requirements for Local Communities and has developed the Related Party Management Program. There is no conflict in land use, customs and other aspects between the Entity and the surrounding villages.
9.7c Local Communities (livelihoods)	Conformance	The Entity has determined the relevant requirements for Local Communities and has developed the Related Party Management Program. The Entity is closely related to the surrounding Communities, and 90% of its employees are local. The Entity has developed plans to support surrounding Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has identified the relevant requirements for Conflict-Affected and High-Risk Areas, including that the Entity shall not contribute to armed conflicts or violations of Human Rights. The Entity conducts annual inspections to determine whether there are business operations or direct raw material suppliers in Conflict-Affected or High-Risk Areas. The Entity undertakes not to engage in conflicts directly or through its own business relationships. It will conduct Due Diligence and

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		risk assessment if its raw materials are sourced from relevant regions.
9.9 Security practice	Conformance	The Entity has determined the relevant requirements for security practices and formulated the Security Code to establish the importance of respecting Human Rights, boundaries of security activities, procedures for dealing with security issues and conflicts, and consequences of any violation of Human Rights. Security personnel must act in accordance with the laws and regulations of the state and the government. The Entity conducts due diligence on human rights activities organised by security personnel at regular intervals. The Entity clearly defines security management responsibilities. The Entity's security personnel are dispatched by Wanji Group, and are under the dual management of the Group and the Entity. The Entity organises regular training for security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects employees' right to Collective Bargaining. Labour Unions at all levels, in accordance with national laws and regulations, negotiate and sign collective contracts with the Entity on behalf of employees on matters such as labour remuneration, working hours, rest and vacation, labour safety and health, vocational training, insurance and welfare. A signed and sealed copy provided by the trade union and enterprise representatives of Xin'an County Enterprise Collective Contract was sighted.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity has determined the relevant requirements for Freedom of Association and right to Collective Bargaining and has developed the Management Program of Freedom of Association and Right to Collective Bargaining. The Entity has developed a salary management system and negotiated and signed collective contracts with employees' representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	When the Freedom of Association and right to Collective Bargaining of Labour Unions are restricted by local laws, the Entity allows Workers to freely choose their own labour representatives. When necessary, the Entity is obliged to assist each department in electing its own employee representative who is responsible for supervising and raising safety and health, welfare and social management issues to the management.
10.2a Child Labour (minimum age)	Conformance	In the 2021 Survey Report on Social Responsibility Management, the Entity states that the employment of Child Labour is prohibited. The Entity eliminates the

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		employment of Child Labour and juvenile workers in accordance with the Labour Law.
10.2b Child Labour (hazardous)	Conformance	The Entity has determined the relevant requirements for Child Labour and has developed the Management Program of Child Labour and Juvenile Workers. The Entity commits to not place juvenile Workers in an unsafe or dangerous environment for their physical and mental health and development, and it ensures that juvenile Workers work in a safe and hygienic environment. Dangerous Child Labour shall not be arranged (for example, juvenile Workers shall not be arranged in work with higher risks and affecting health and safety, such as generator operation and handling.).
10.2c Child Labour (worst forms)	Conformance	The Entity has determined the relevant requirements for Child Labour and has developed the Management Program of Child Labour and Juvenile Workers. The Entity commits to not place juvenile Workers in an unsafe or dangerous environment and the Worst Forms of Child Labour are not allowed.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour is not appropriate practice and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour.
10.3c Forced Labour (Migrant Workers)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour.
10.3d Forced Labour (Debt Bondage)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is neither involved in Forced Labour nor asks for any form of deposit.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is neither involved in Forced

CRITERION	RATING	COMMENT
		Labour nor restricts Workers' freedom of movement in the workplace.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour. The Entity does not hold any original documents of Workers, such as identification (ID) cards, passports or qualification certificates, and only keep copies of ID cards and graduation certificates in their personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that Forced Labour should be eliminated and that the Labour Law should be strictly observed. The Entity is not involved in Forced Labour. The time for dissolving the labour contract is stipulated in the labour contract.
10.4 Non-Discrimination	Conformance	The Entity confirmed in the 2021 Survey Report on Social Responsibility Management that an effective monitoring mechanism shall be established according to industry-related international conventions, laws and regulations to ensure the implementation of the principle of non-discrimination in all business activities.
10.5 Communication and engagement	Conformance	The Entity encourages employees to participate in the ASI Management System and establishes direct contact with employees and representatives of the Work Safety Management Committee. The Entity provides a well-developed feedback and communication mechanism and smooth channels for respondents.
10.6 Disciplinary practices	Conformance	The Entity does not tolerate any form of punishment and harassment. It requires its suppliers to abide by the Code of Conduct. Disciplinary practices are determined according to the law, with the participation of employee representatives. All disciplinary records need to be confirmed by employees and the management.
10.7a Remuneration (living wage)	Conformance	The Entity has determined the relevant requirements for Remuneration and has developed the Salary Management Program. The standard wage paid to employees is not lower than the minimum standard specified by the local government, and the wage earned by employees is sufficient to meet their basic needs and pay household expenses. The current wage paid by the Entity conforms to the statutory standards and meets the basic needs of Workers.

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	The Entity has determined the relevant requirements for Remuneration and has developed the Salary Management Program. The Entity does not unreasonably deduct wages for disciplinary purposes, and stipulates that wages are paid once a month and that wages and benefits are fully consistent with all Applicable Laws. Wages and benefits are paid in a form that is convenient for employees.
10.8 Working Time	Conformance	The Entity has determined the relevant requirements for Working Time and has developed the Working Time Management Program. The Entity abides by Applicable Law and industry standards on working hours and public holidays, and the standard working hours in a week (excluding Overtime) does not exceed 40 hours, in accordance with the law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity has obtained certification to ISO 45001:2018. The scope of certification includes production of aluminium alloy plates, strips and foils and related activities. The certificate is valid from 18 September 2021 to 19 September 2024.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity has established sufficient and effective management manuals and procedures to ensure that all employees and related parties comply with internal OH&S Management System rules, including induction training for new employees, regular physical examinations and regular monitoring.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Minor Non-Conformance	The Entity has identified and formulated the List of Applicable Laws, Regulations and Other Requirements on Environment and Occupational Health and Safety, including compliance evaluation. However, some legal standards have not been collected and updated, such as Trade Union Law; Work Safety Law; Law on Prevention and Control of Occupational Diseases; Food Safety Law and Fire Services Act.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has identified the relevant requirements for the Occupational Health and Safety (OH&S) Policy in the ASI Performance Assurance Manual. The Entity has established, implemented and operates an OH&S Management System and strictly enforces relevant laws and regulations (e.g., Work Safety Law of the People's Republic of China), including the right to stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established OH&S control procedures, including special operations, occupational disease

CRITERION	RATING	COMMENT
		control and emergency drills, which meet applicable domestic and international standards. Chemical MSDS safety technical instructions and corresponding fire protection facilities have been improved since the pervious (certification) audit.
11.3 Employee engagement on health and safety	Conformance	The Entity has sufficient and effective mechanisms to collect Workers' feedback on Occupational Health and Safety. Above mechanisms include suggestion boxes, employee representative conferences and irregular Workers' interviews.
11.4 OH&S performance	Conformance	The Entity conducts occupational health evaluations every year and monitors and evaluates the exposure concentration of harmful factors in the Entity's production workplaces to determine whether it can meet the requirements of the existing exposure limit of factors. It also takes effective remedial measures and improvement measures in accordance with the recommended measures in the Occupational Health Evaluation Report to continuously improve the OH&S performance. The 2021 Work Safety Goals and Assessment Plan includes target implementation plans, and requires the Entity to report on the completion of the goals each month.

Document Control and Version History

Revision	Date	Notes
0	29 September 2020	Issued (Initial Certification)
1	12 May 2022	Surveillance Audit