
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

XIAMEN XIASHUN ALUMINIUM FOIL CO., LTD.

CERTIFICATE
NUMBER

33

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

17 JULY 2022

DATE OF EXPIRY

16 JULY 2025

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John', written over a white background.

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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

Xiashun manufactures and sells Foil Stock, Lithographic and Closure sheets and ultra-thin aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. Xiashun's Headquarters and production facilities (Sheet Plant, Haicang Foil Plant, Huli Foil Plant) are located in Fujian, China

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
ENTITY NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
CERTIFICATION SCOPE	Xiashun manufactures and sells Foil Stock, Lithographic and Closure sheets and ultra-thin aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. Xiashun's Headquarters and production facilities (Sheet Plant, Haicang Foil Plant, Huli Foil Plant) are located in Fujian, China
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 26 April 2019)Surveillance Audit (9 – 12 August 2021)Re-Certification Audit (16 – 18 May 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">24 – 26 April 2019 (Initial Certification Audit)9 – 12 August 2021 (Surveillance Audit)16 – 18 May 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 May 2019 (Initial Certification Audit)28 August 2021 (Surveillance Audit)11 July 2022 (Re-Certification Audit)
AUDIT SCOPE	<u>Initial Certification Audit (24 – 26 April 2019)</u> Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing, at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.

Supply chain activities included in the audit scope:

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

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Surveillance Audit (9 – 12 August 2021)

The audit scope included the remelting, casting, hot rolling, cold rolling, and finishing (foilstock, litho stock (CTP), capstock) and foil rolling and finishing (light-gauge aluminium foil that is less than 10µm and lithium battery foil) at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.

Supply chain activities included in the audit scope:

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

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Re-Certification Audit (16 – 18 May 2022)

The audit scope covers the manufacture and sale of Foil Stock, Lithographic and Closure sheets, ultra-thin aluminum foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. The facilities include Headquarters and the production sites Sheet Plant, Haicang Foil Plant and Huli Foil Plant.

Supply chain activities included in the audit scope:

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

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 17 July 2022 – 16 July 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 16 July 2024

CERTIFICATE NUMBER 33

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes to conform to the legal compliance requirements in the ASI Performance Standard. There have been no fines or requests for corrective actions from the government agencies and other stakeholders in the past two years. The Entity conducts the compliance evaluation on an annual basis. According to the latest evaluation, there was no violation found.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are well implemented and trained. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The whistleblowing channels are available to all interested parties. There was one case received in 2021 and two cases in 2022.
1.3 Code of Conduct	Conformance	The Entity has established a Code of Conduct which covers social and governance principles. The policies and the associated management procedures against ISO 14001 and ISO 45001 cover the implementation of management requirements on environment and occupational health and safety. The Code of Conduct is available for all interested stakeholders on the Entity's website: http://www.xiashun.com/responsibility
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The management Policies are consistent with the environmental, social, and governance practices, and published on the Entity's official website: http://www.xiashun.com/responsibility
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates commitment to the implemented Policies, endorsement and support to provide sufficient resources for regular review of policies, meeting the ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external stakeholders by training, publishing on website and posts on-site. For further information, please refer:

CRITERION	RATING	COMMENT
		http://www.xiashun.com/responsibility For internal communication, the Entity uses WeChat to publish all contents on ASI to all employees.
2.2 Leadership	Conformance	A senior Management Representative has been nominated. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The Certification Scope is 'Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers the Haicang Foil Plant, Huli Foil Plant and Sheet Plant production facilities'. The latest ISO 14001:2015 audit was conducted in April 2021 and there were no major non-conformances issued and the Entity has analyzed the root cause of 10 minor non-conformances raised and has implemented the required corrective actions.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented and documented a Social Management Systems and holds a valid ISO 45001:2018 certification., The latest audit was conducted on in April 2021 and there were no major non-conformance raised and nine minor non-conformances. The Entity has analyzed the root cause, and established and implemented the required corrective action.
2.4 Responsible Sourcing	Conformance	The Entity has established and communicated the Responsible Purchasing Policy to all suppliers and contractors, which covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard: http://www.xiashun.com/responsibility
2.5 Impact Assessments	Conformance	The environmental, social, cultural and Human Rights Impact Assessments are well implemented at various departments. The identified risks on environment, social occupational health and safety and governance are assessed. The latest Impact Assessment on Human Rights, Labour Rights, and Governance was conducted in February 2022. The control measures for the identified risks are defined and implemented. There has not been any New Projects or Major

CRITERION	RATING	COMMENT
		Changes since the Entity became an ASI Member.
2.6 Emergency Response Plan	Conformance	In collaboration with potentially affected stakeholder groups, the Emergency Response Plans on Human Rights, Labour Rights, Environment, Occupational Health and Safety are established, well implemented and trained.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions, but there has been no such activity since the ASI Management System became operational in 2018.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment in accordance with the requirement of ASI Performance Standard. There has been no such case since the ASI Management System became operational in 2018.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability Report includes the information on the Entity's management practices and performance on governance, environment, human rights, and labour rights including occupational health and safety. The 2021 Sustainability Report is published on the Entity's website: https://www.xiashun.com/responsibility
3.2 Non-compliance and liabilities	Conformance	There were no non-compliance or liabilities recorded in the Sustainability Report in 2021. According to the official websites of the relevant government agencies and non-government organizations (NGOs), there was no non-compliance or liability cases raised by the government agencies.
3.3a Payments to governments (legal and contractual)	Conformance	According to the financial audit report, reviewed by a third party, the payments to government made by the Entity are only those legally required; and there were no other payments.
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	Internal and external whistleblowing/ Complaints Resolution Mechanism exists (e.g., whistleblower hotlines, mail address, suggestion box): http://www.xiashun.com/responsibility

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted environmental Life Cycle Assessments (LCA) to include its aluminium foil and sheet products. The LCA is cradle-to-gate and the impact of the various production stages and of End of Life recycling is assessed.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental Life Cycle Assessment (LCA) reports for the two types of products are published on the Entity's website and can be accessed by external parties: http://www.xiashun.com/responsibility
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The environmental Life Cycle Assessment (LCA) reports for the two types of products are published on the Entity's website: http://www.xiashun.com/responsibility
4.2 Product design	Conformance	In accordance with the product development process, environmental impacts are taken into consideration at the product development stage.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established the management process for Aluminium Process Scrap. The Process Scrap generated in manufacture processes for sheet and foils are all collected, packed, re-melted or sold to third parties for recycling or processing. The Process Scrap utilization rate is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	In accordance with results of the risk analysis, the Entity's process foil scrap does not require separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity communicates with its main customer to discuss how to improve the recycling rate of products at End of Life. Currently, non-conforming products at the customers' sites are returned to the Entity for recycling. However, recycling of Post-Consumer Scrap, from a financial and quality point of view, is not possible in the foil manufacturing process.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity is working with the customer to decide how to improve the recycling rate of products at End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The major Greenhouse Gas (GHG) emissions and energy use are tracked, calculated and documented annually. The 2021 GHG emissions information is published on the Entity's website: https://www.xiashun.com/public/attachment/images/20220523/7afcbe142290302d2790598ee1796e6c.pdf</p> <p>The GHG emission report is prepared by a third party but without verification.</p> <p>The Entity publicly discloses environmental protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section:: https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>The Entity has established a GHG emission reduction target for 2022, as compared to actual 2021 emissions: GHG emissions per ton of aluminium sheet products to be reduced by 2.0%, and GHG emissions per ton of aluminium foil products to be reduced by 2.0%. In the plan, the primary GHG emission source of electricity consumption is identified and the associated measure is to reduce electricity consumption by phasing out energy-intensive equipment. The GHG emissions target is published: https://www.xiashun.com/public/attachment/images/20220523/ea2c375318942ea917876096602850bc.pdf</p> <p>The Entity publicly discloses environmental protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section: https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf</p> <p>However, the accuracy of GHG emission baseline data disclosed in the 2022 reduction plan is inadequate: 1) the COD data used to calculate the emission of wastewater treatment process is not sufficiently representative; 2) the emission factor of electricity adopted differs between years.</p>
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.

CRITERION	RATING	COMMENT
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	<p>The waste air generated in the operation is collected and treated before discharge. The Entity has developed and implemented an Air Emissions Management Plan with actions and controls to mitigate adverse impacts.</p> <p>The Entity publicly discloses air emissions information annually in the Environmental Information Disclosure Reports, refer to the Emissions Information section:</p> <p>https://www.xiashun.com/public/attachment/images/20220523/06546b3c98bad95f1ed6143335485d85.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/3733168761cb7ece57b52b10234791bb.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/7f50d0b4e01687b1ac24752e87adc3b7.pdf</p>
6.2 Discharges to Water	Conformance	<p>The Discharges to Water is covered and managed within the Environmental Management System. The monitoring reports of wastewater discharge in 2021 and 2022 indicate all major pollutants were monitored, and results for these major pollutants meet the local legal discharge limit.</p> <p>The Entity publicly discloses wastewater discharge information annually in the Environmental Information Disclosure Reports, refer to the Emissions Information section:</p> <p>https://www.xiashun.com/public/attachment/images/20220523/06546b3c98bad95f1ed6143335485d85.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/3733168761cb7ece57b52b10234791bb.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/7f50d0b4e01687b1ac24752e87adc3b7.pdf</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where Spills and Leakage may contaminate air, water and soil has been completed by the Entity by following the risk assessment process of the Environmental Management System.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of Spills and Leakage is defined in the Entity's ASI Management Manual. Serious spills and leakages are handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The process for reporting Spills is defined in the Entity's emergency preparedness and action management procedure, and the communication management procedure. The Entity discloses relevant information to affected parties following a spill/leakage incident. There have been no Spills during 2020 and 2021.
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The reporting of Spills is defined in the emergency preparedness and action management procedure, and information communication management procedure. There have been no spills during 2020 or 2021. The Entity publicly discloses information in the 2020 and 2021 Social Responsibility Report, refer to the Environmental Protection and Sustainable Development section:</p> <p>https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/b2ec726b07732eb844d4607328336c3.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. The Entity implements a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is in compliance with the legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	<p>The quantity of Hazardous and Non-Hazardous Waste generated by the Entity is registered in the Solid Waste Information management system and published, refer to the 2022 Q1 reports available on the Entity's website:</p> <p>https://www.xiashun.com/public/attachment/images/20220523/54e88995addbb3b323a6ae2ee833394f.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/47f822c1eaaafd2da0252f4d712751c1.pdf</p> <p>https://www.xiashun.com/public/attachment/images/20220523/f8c98ceb924f7a1cbb30aefe8362d042.pdf</p> <p>The Entity publicly discloses environmental</p>

CRITERION	RATING	COMMENT
		protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section: https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf
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.
6.6e Bauxite Residue (start 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)	Conformance	The Aluminium from the Dross pressing is recycled in the Entity's melting furnaces. The remainder is sold to external dross processors to further extract the remaining Aluminium and re-used to produce aluminium alloying ingots.
6.8b Dross (recycling)	Conformance	The Aluminium from the Dross pressing is recycled in the Entity's melting furnaces. The remainder is sold to external dross processors to further extract the remaining Aluminium used to produce aluminium alloying ingots.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	The Entity reviews the internal Dross processing method and dross sales annually. Dross is not landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water source is municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into Public Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks and determined that the level of water-related risk is low: https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfbb62561274ad896a8fd.pdf
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as there are no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as there are no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Entity has published the water-related risk assessment report: https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfbb62561274ad896a8fd.pdf . The Entity has publicly disclosed environmental protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section: https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System. The Entity is not within or close to any protected area, therefore the risk or impact by the operation of the Entity on Biodiversity is low. Further information is available at: https://www.xiashun.com/public/attachment/images/20220523/d5c881d646ae666388482272738e5e9c.pdf

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the Entity's Area of Influence.
8.3 Alien Species	Conformance	The main carrier medium (pallets which is wood) is processed in a way to avoid the introduction of Alien Species.
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 established a Human Rights and Business Ethics Policy and communicated it to all employees: http://www.xiashun.com/responsibility
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights and extends this commitment in the supply chain. The Due Diligence process has been established and implemented to cover the supply chain. The due diligence audits are conducted for major suppliers and the suppliers are required to take any necessary corrective actions based on the findings.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published the complaints/grievance channel to stakeholders and defines how to investigate reported cases and take action, including the remedy measures. There has been no adverse impact reported and therefore remedy is not required.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met. There has been no complaint received from women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Certification Scope of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Certification Scope of the Entity.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as Resettlement has not been necessary in the site's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as Resettlement has not been necessary in the site's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The Entity has made a commitment to respect the rights and interests of local Communities. There has been no complaint received from Local Communities.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local Communities are established and implemented. There has been no complaint received from Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs people from the local Communities, and prevents adverse impacts to their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not using conflict minerals and communicates this through the aluminium value chain. For further information, please refer: http://www.xiashun.com/responsibility The Entity conducts an analysis to determine if the conflict minerals are used in products or the production processes. The result is no conflict minerals are used, and no materials are from Conflict-Affected and High-Risk Areas.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity implements security practices that respect Human Rights. The outsourced security service provider is qualified by the local authority. The agreement between the Entity and the service provider clearly defines the security responsibility and authorities, and the associated training is provided to the security guards. There has been no complaint received in 2021 about the security 'practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the Workers' rights. There are 105 elected Worker representatives and the trade union is established in accordance to the legal requirement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are laws that restrict Freedom of Association in China. However, the Entity has a Collective Bargaining Agreement for wages covering all employees. The employee representative meeting approved the agreement, and this was also reviewed and registered with the associated government agency.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers' representatives can deal with the Workers' concerns with management on behalf of Workers. There were three complaints received since January 2021 and the Workers' representatives are involved in the investigation and implementation of actions.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in China. There is no Child Labour or young Workers in the Entity. The youngest Worker, who began employment at the Entity in January 2022, was born in December 2002.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. There is no Child Labour or young Workers at the Entity.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in China. The Entity commits itself - and expects its suppliers - to comply with the prohibition of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself - and expects its suppliers - to comply with the prohibition of

CRITERION	RATING	COMMENT
		Forced Labour, slavery and Human Trafficking. Relevant training about Forced Labour is provided to Workers, and there is known or reported case of Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are hired directly. Workers are not required to provide any form of deposit; recruitment fee or equipment advance.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers at the Entity, all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour, and does not provide any type of loan to Workers.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour, and there is no restriction of Workers' movement at site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of original copies of Workers' documents, only copies of original documents are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Workers at the Entity can terminate their employment with a specific notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the Labour Contract Law: 30 days in advance or three days in the period of probation..
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. There has been no case of Discrimination received or found.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers' representatives is established. All interviewed Workers state they know how to complain or report their concerns.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, and disciplinary measures are in compliance with legal requirements and require the confirmation of Worker involved. Wages are not deducted or reduced for disciplinary reasons.
10.7a Remuneration (living wage)	Conformance	The Entity's wage structure is clearly defined and the basic wage is above the legal minimum wage. The total payment meets the Workers' basic

CRITERION	RATING	COMMENT
		needs and all Workers are enrolled in the mandatory social insurance scheme.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all Workers by bank transfer on the 12 th day of the following month. All interviewed Workers state they understand the information on the pay slips.
10.8 Working Time	Minor Non-Conformance	The working hours are recorded and managed and are in compliance with Chinese Labour Law. The total weekly hours do not exceed 60, at least one day rest in a week are guaranteed. However, some Workers' daily Overtime hours exceed the legally established hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified. The Occupational Health and Safety Policy is implemented, reviewed periodically and communicated with stakeholders: https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational Health and Safety Policy is applied to Workers and visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Occupational Health and Safety Policy includes commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has provided Workers with the necessary training courses to understand the hazards, OH&S risks and safe practices relevant to them, and their right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certificate. The Certification Scope is 'Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers the Haicang Foil Plant, Huli Foil Plant and Sheet Plant production facilities'.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirements and OH&S Management System requirements, the

CRITERION	RATING	COMMENT
		Entity has a system of Workers' consultation and participation in health and safety. The management responds to the concerns and advises on OH&S issues from Workers.
11.4 OH&S performance	Minor Non-Conformance	<p>The Occupational Health and Safety (OH&S) targets and improvements are documented in the Occupational Health and Safety Program. For further information refer to the 2021 Sustainability Report:</p> <p>https://www.xiashun.com/public/attachment/images/20220523/d101adb1b6089cfd0b1adf8f6d325f75.pdf</p> <p>However, one minor non-conformance is raised as a small number of Workers did not participate in the regular health examination as legally required.</p>

Document Control and Version History

Revision	Date	Notes
0	17 July 2019	Initial Certification Audit – Full Certification
1	29 October 2021	Surveillance Audit; Certification Scope revised to update the products and processes and shorten the description of the site locations; Revised the processes listed in the Audit Scope description for the Initial Certification Audit.
2	26 July 2022	Re-Certification Audit – Full Certification Certification Scope updated to more accurately represent the Entity's products and processes.