

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Anhui Maximum Aluminium Industries Co., Ltd.

CERTIFICATE NUMBER
412

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
9 JANUARY 2026

DATE OF EXPIRY
8 JANUARY 2029

CERTIFIED SINCE
7 MARCH 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'Jha'.

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

CERTIFICATION SCOPE

Anhui Maximum Aluminium
Industries Co., Ltd., located at No.
88, Yinghua West Road, Suixi
Economic Development Zone,
Huabei, Anhui, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Maximum Aluminium Industries Co., Ltd.
CERTIFICATION SCOPE	Anhui Maximum Aluminium Industries Co., Ltd., located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 - 11 October 2024)Surveillance Audit and Scope Change (8 - 9 September 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">10 - 11 October 2024 (Initial Certification Audit)8 - 9 September 2025 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">30 October 2024 (Initial Certification Audit)26 November 2025 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 - 11 October 2024)</u></p> <p>The Audit Scope included the Casting and cold rolling workshops of Anhui Maximum Aluminium Industries Co., Ltd. at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">CasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit and Scope Change (8 - 9 September 2025)</u></p> <p>The Audit Scope included the Casting and cold rolling workshops of Anhui Maximum Aluminium Industries Co., Ltd. at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication

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

AUDIT OUTCOME

- Certification

GHG PERFORMANCE EXEMPTION

The Entity has been approved for an exemption relating to its GHG emissions performance under Criteria 5.3a and/or 5.4. Under this exemption, Major Non-Conformance(s) will not count towards any Provisional Certification status, and the Entity must develop Corrective Action Plans and demonstrate progress over time.

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

9 January 2026 – 8 January 2029

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

9 July 2027

CERTIFICATE NUMBER

412



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Anhui Maximum Aluminium Industries Co., Ltd. (the 'Entity') is located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei City, Anhui Province. It commenced operations in April 2013 and was fully acquired in 2017 by Jiangsu Zhongji Composite Material Co., Ltd, a subsidiary of Wanshun New Material, after which it was renamed Anhui Zhongji Battery Foil Technology Co., Ltd.

Initially comprising three major workshops—Casting, cold rolling, and foil rolling, the Casting and cold rolling workshops were separated from Anhui Zhongji at the end of 2022 and re-established as Anhui Maximum Aluminium Industries Co., Ltd with an area of 8,000 square meters. The Entity specialises in producing Aluminium plate strips with an annual production capacity of 60,000 tonnes. Its key processes include Casting, rolling, and cold rolling. The Facility comprises two flat manufacturing buildings and shares office and residential buildings with Anhui Zhongji.

The Entity operates two plants, a canteen building, and an office building, employing over 170 persons.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a Management System to identify, assess, and manage ASI-related legal and other requirements. These requirements are incorporated into operational processes, with Compliance reviewed and evaluated on an annual basis.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented Policies and procedures to manage anti-Corruption, including 'whistleblowing' mechanisms such as a suggestion box, hotline, and email, which are communicated to employees and relevant parties. Anti-Corruption training is provided to employees in high-risk positions, and the Policy is shared with all suppliers, who sign a commitment letter as acknowledgement.
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed an ASI Code of Conduct outlining principles related to Environmental, Social, and Governance (ESG) performance. Training and communication initiatives are implemented to raise awareness of the Code among business partners and suppliers. The Code of Conduct is reviewed annually during the management review meeting or when Material changes or control gaps arise.</p> <p>The Code of Conduct is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20250901100550.doc&swdOrigin=BROWSELINK NK</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented a management Policy aligned with ESG practices. Senior management has demonstrated their commitment to these Policies, which are reviewed annually or when their Material changes or control gaps arise. The ASI Social/Environmental/Safety Management Policy are accessible to both internal and external Stakeholders at: http://cn.ahzjalufoil.com/upload/20250929144146.doc
2.2a-c Leadership	Conformance	The Entity has appointed a senior Management Representative with overall responsibility and authority for ensuring Conformance with the ASI Performance Standard. This role includes leading the communication of ASI-related requirements and Policies through training programs and on-site postings.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System and maintains a valid ISO 14001:2015 certification. The latest external audit, conducted in June 2025, identified no major non-conformities.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management System to assess key social and Occupational Health and Safety (OH&S) impacts. It has implemented management provisions to prevent and mitigate these impacts effectively.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has established and implemented Policies, systems, procedures, and processes to ensure responsible sourcing. Second-

CRITERION	RATING	COMMENT
		<p>party Due Diligence audits are carried out at key next-tier supplier sites to evaluate their qualification. Relevant personnel, including the procurement team, receive annual training on responsible sourcing requirements. The Responsible Purchasing Policy is reviewed as part of the annual management review meeting and revised whenever a Material change or control gap is identified.</p> <p>This Responsible Procurement Policy is available at: http://cn.ahzjalufoil.com/upload/20250929144226.doc</p> <p>It was identified in the 2024-2025 supplier Due Diligence audit plan that the Entity did not include certain suppliers of auxiliary materials, primarily alloy additives, in the audit schedule, resulting in the omission of Due Diligence audits for these suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the previous ASI Audit.</p> <p>In 2023, the Entity conducted an Environmental and Social Impact Assessment for its Aluminium plate Casting and rolling capacity expansion project, implementing a management plan to prevent and mitigate significant impacts, while thoroughly evaluating potential effects on existing Facilities.</p> <p>The Entity reviews its environmental and social management plan annually through monitoring and management review meetings and commits to reassessing the plan if significant organizational changes or control deficiencies arise. The assessment report and management plan are publicly available at: http://cn.ahzjalufoil.com/upload/20250929145739.docx</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the previous ASI Audit.</p> <p>The Entity has conducted a Human Rights risk assessment for the Aluminium plate and strip expansion project, initiated in 2023 and now completed, in accordance with ASI Performance Standards and relevant legal requirements, identifying and evaluating potential risks and implementing corresponding control measures. The assessment concluded that, given the scale and nature of the project, related risks and impacts have been effectively mitigated. No Indigenous communities were identified within the project's Area of Influence. The Human Rights risk assessment was reviewed during the annual management review meeting, and the assessment report, along with the latest effective version of the management plan, has been publicly disclosed at: http://cn.ahzjalufoil.com/upload/20250929144355.doc</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed two emergency response plans, one for sudden environmental incidents and one for production safety accidents, both registered with the relevant government agencies. The Entity provides employee training and conducts drills on emergency response. These plans are reviewed every three years or whenever there is a Material change or control gap and will be resubmitted to the authorities for registration. The two emergency response plans are available at:</p> <p>Emergency Response Plan for Sudden Environmental Incidents: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20250901100939.doc&wdOrigin=BROWSELINK</p>

CRITERION	RATING	COMMENT
		Emergency Response Plan for Production Safety Accidents: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20250901101001.docx&wdOrigin=BROWSELINK
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan that addresses Material adverse ESG impacts. The Plan has been developed in collaboration with key Stakeholders, including Workers and their representatives. According to the Entity's ASI Performance Standard management manual, the Plan will be reviewed during the annual management meeting or whenever there are Material Business changes or control gaps.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions. The Entity will conduct a review of relevant ESG practices as part of merger and acquisition Due Diligence in accordance with established regulations, including practices related to past Aluminium business operations. No such instance has occurred since its establishment in 2011.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. The Entity commits that, in the event of future closures, decommissioning, or divestment, it will collaborate with Stakeholders to review and develop control plans aimed at monitoring and managing the resulting ESG impacts and risks. No such instance has occurred since its establishment in 2011.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and Material environmental, social, and economic impacts in its 2024 Sustainability Report, available at: http://cn.ahzjalufoil.com/upload/20250929144500.docx
3.2 Non-compliance and Liabilities	Conformance	The Entity has established a transparent information disclosure system. The 2024 Sustainability Report discloses an incident in 2024 where the failure to properly operate air pollution control facilities and the violation of air pollution management regulations resulted in ecological damage and administrative penalties were imposed by the authorities. Refer to the 'Compliance Operations' section: http://cn.ahzjalufoil.com/upload/20250929144500.docx
3.3a-c Payments to Governments	Conformance	In line with internal control procedures, the Entity ensures that payments to the government are made strictly on legal grounds. Within China, the Entity does not engage in any payments to political parties, and government payments are solely limited to taxes, excluding any other types of payments. As a subsidiary of a publicly listed company, the Entity's annual consolidated financial report publicly discloses all payments made to the government in accordance with applicable securities law provisions, available at: https://money.finance.sina.com.cn/corp/view/vCB_AllBulletinDetail.php?stockid=300057&id=10855980
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity has established a clear complaints resolution Policy that encourages both internal and external Stakeholders to report misconduct while ensuring strict protection of the complainants' privacy and preventing any form of retaliation. The 'whistleblowing'

CRITERION	RATING	COMMENT
and Requests for Information		<p>hotline and email are open to all relevant parties. Further details can be found in the Responsible Procurement Policy: http://cn.ahzjalufoil.com/upload/20250929144226.doc</p> <p>and the Stakeholder Complaint and Appeal Resolution Mechanism: http://cn.ahzjalufoil.com/upload/20250929144534.docx</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>In adherence to the methods prescribed by ISO 14040, the Entity conducted a Life Cycle Assessment (LCA) of its primary product, Aluminium plate strips, within a 'cradle-to-gate' framework. The established methodology was applied to evaluate the environmental impact of major product lines. The LCA results revealed that Greenhouse Gas emissions, particularly those from the upstream Aluminium electrolysis process, exert significant environmental impacts.</p> <p>The Entity's LCA process however did not comprehensively analyse various environmental impact categories.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity's LCA report covers its Aluminium plate strip products. The Entity is committed to providing additional lifecycle data upon customer request. The report includes basic LCA information and assumptions and is available at: http://cn.ahzjalufoil.com/upload/20250929144549.docx</p> <p>However, the information in the Entity's LCA report is currently incomplete.</p>
4.2 Product Design	Conformance	<p>The Entity does not engage in product design but rather incorporates sustainability objectives into its production process and raw material procurement to improve product sustainability, including the environmental lifecycle impact of the final products.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has developed regulations for Aluminium Scrap recycling, aiming for 100% collection and recycling of Process Scrap. To meet this goal, it has adopted both technical and management measures to minimise the production of Aluminium Process Scrap and ensure effective recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity uses Aluminium ingots and Aluminium Scrap generated during downstream processes but does not utilise Post-Consumer Scrap due to quality concerns from end users.</p> <p>The Entity collaborates with downstream customers to explore the integration and increase the use of Scrap Aluminium into their products and increase End of Life product recycling. Additionally, the Entity participates in public seminars on Aluminium Scrap recycling and promotes the utilisation of post-consumer Aluminium through initiatives, aiming to achieve resource circularity.</p>

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established and implemented a management process for Greenhouse Gas (GHG) emissions in accordance with ISO 14064 standards. In 2024, the Entity conducted inventories of its organisational GHG emissions, accounting for Material energy use and GHG Emissions by source, including the GHG emissions of Scopes 1 and 2 and the major Scope 3 emissions, including purchased materials and transportation. The Entity engages a Third Party to verify the relevant emissions data.</p> <p>The Entity's GHG Emissions Report is available at: http://cn.ahzjalufoil.com/upload/20250901101759.pdf</p> <p>The GHG Verification Report is available at: http://cn.ahzjalufoil.com/upload/20250901101359.pdf</p> <p>However, the Entity has used emissions factors for purchased materials from the database rather than the data directly from the suppliers.</p>
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	Major Non-Conformance	<p>The Entity has developed a GHG emissions reduction strategy aimed at reducing the CO₂ emissions intensity of its products to below 12.0 tonnes CO₂e/t from 'cradle to gate' by 2028. To achieve this, the Entity is implementing various technological and managerial measures to minimise GHG emissions across its supply chain and production processes. In addition to general initiatives such as improving energy efficiency and optimising processes to reduce energy consumption, the Entity's primary strategy focuses on sourcing 'low-carbon' footprint raw materials to lower its product carbon intensity. The Entity has used the ASI GHG Pathway Calculation Tool to validate its plan, confirming alignment with the 1.5°C scenario using a 2023 baseline.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has developed a GHG emissions reduction strategy aimed at reducing the CO₂ emissions intensity of its products to below 12.0 tonnes CO₂e/t from 'cradle to gate' by 2028. To achieve this, the Entity is implementing various technological and managerial measures to minimise GHG emissions across its supply chain and production processes. In addition to general initiatives like improving energy efficiency and optimising processes to reduce energy consumption, the Entity's primary strategy focuses on sourcing low-carbon footprint raw materials, such as Primary Aluminium, to lower product carbon intensity. The Entity has used the ASI GHG Pathway Calculation Tool to validate its plan, confirming alignment with the 1.5°C scenario criteria. The Entity has publicly disclosed its Energy Efficiency and Emissions Reduction Action Plan, providing detailed information on the emissions reduction targets and plans for 2028. The report is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.a</p>

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		<p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fczjalufoil.com%2Fupload%2F20250901101417.docx&wdOrigin=BROWSELINK</p> <p>The Entity's ASI Entity GHG Pathways Calculation Sheet is publicly available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fczjalufoil.com%2Fupload%2F20241211150223.xls&wdOrigin=BROWSELINK</p>
5.4 GHG Emissions Management	Major Non-Conformance	<p>The Entity has developed a GHG Emissions Reduction Plan to outline its approach to managing GHG emissions, with a primary focus on energy management. Through site observations, document reviews, interviews, and using the Plan-Do-Check-Act approach, the Entity manages energy consumption and monitors system performance.</p> <p>The Entity however did not achieve the GHG emissions targets in line with its GHG Emissions Reduction Pathway for 2024. The Entity meets the ASI 'Criteria 5.3a & 5.4 Exemption Process' conditions. Under these exemption rules, Major Non-Conformance does not count towards a Provisional Certification. It is expected that the Entity will be required to ongoing disclose its performance and meet other requirements of the GHG emissions related Criteria and to reduce its emissions intensity. As subsequent Audits, the Entity's ability to meet the conditions of exemption will be reviewed, should the Major Non-Conformances remain valid.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's primary sources of air pollution are volatile organic compounds (VOCs) and oxides of nitrogen (NOx). To address this, the Entity has implemented an air emissions management programme, including regular maintenance of air pollution control systems and routine exhaust emissions checks. The Entity will update the programme when significant air pollution risks arise and will regularly review its reduction plan. Annual reports on air pollutant monitoring confirm Compliance with regulatory standards. The Entity's pollution reduction plan and annual emissions data are available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fczjalufoil.com%2Fupload%2F20250901101437.docx&wdOrigin=BROWSELINK</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity focuses on Aluminium Casting, rolling, and sheet rolling processes, which do not generate process wastewater. The Entity's water usage primarily consists of cooling water for production equipment and domestic water, including workshop cleaning water.</p> <p>An assessment of water resources and annual monitoring of domestic wastewater discharge shows that the Entity's water use has minimal impact on water resources and the environment.</p> <p>Whilst the Entity does not currently plan to reduce water pollutant concentrations, it aims to decrease overall wastewater discharge volumes by 5% by 2028. Additionally, the Entity commits to regularly reviewing and addressing any deficiencies in its water pollutant management plan.</p> <p>The Entity's Wastewater Discharge Pollutants Report and Reduction Plan is available at:</p> <p>https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fczjalufoil.com%2Fupload%2F20250901101437.docx&wdOrigin=BROWSELINK</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has a procedure for assessing and managing the risks of Spills and Leakages and prepares corresponding emergency response plans. The Entity conducts regular assessments to identify potential sources of Spills and Leakages. It also commits to updating and improving emergency response and leak prevention plans whenever changes in the Entity may impact significant risks or when control gaps are identified.</p> <p>The Risk Identification and Management Plan is available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcdn.hzjalufoil.com%2Fupload%2F20250901101454.xls&wdOrigin=BROWSELINK</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's environmental protection management procedure and emergency response plans outline the process for reporting Spills and Leakages, including reporting incidents to the local government agency and the affected parties.</p> <p>Since its establishment in 2022, no Spills or Leakages have been recorded.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has established an Environmental Management System that addresses waste management. The Entity has implemented a waste strategy following the Waste Mitigation Hierarchy, focusing on reusing and recycling to reduce Material impacts. Hazardous Waste disposal complies with legal requirements. The Entity publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated in 2024 in the Sustainability Report, page 17: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcdn.hzjalufoil.com%2Fupload%2F20250901101021.docx&wdOrigin=BROWSELINK</p> <p>However, the associated waste disposal methods are not disclosed.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity has implemented a management process for collecting and reducing the Aluminium content in Dross. Monthly reviews are conducted to assess overall Aluminium content and collection to maximise Aluminium utilisation. The generated Dross is sent to Government-approved Hazardous Waste disposal companies for recycling into building materials, purifying agents and other products. The Entity performs annual on-site inspections of these recycling companies to ensure the Dross is not landfilled. Additionally, a plan has been developed to reduce the Aluminium content in unprocessed Dross, further improving raw material utilisation.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has documented its water intake and usage, including sources and types, as part of its environmental impact and water resource risk assessments. It has evaluated water-related risks, considering the surrounding water environment, intake and discharge, and the effectiveness of existing management measures. The Entity's overall water resource risk has been assessed as low, with no significant water-related risks within its Area of Influence. A risk</p>

CRITERION	RATING	COMMENT
		assessment report and water balance diagram are available at: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcdn.hzjalufoil.com%2Fupload%2F20250901101515.docx&wdOrigin=BROWSELINK
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risk assessment was rated as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A qualified Third Party has conducted the Environmental Impact Assessment, which included the evaluation of Biodiversity and Ecosystem Service risks. The local environmental protection agency has approved the outcomes of this assessment. Based on this risk assessment, the Entity's Area of Influence does not impact any Biodiversity-sensitive areas. The Entity is located within a Government-planned industrial zone with a functional Environmental Management System.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the impacts on Biodiversity and Ecosystem Service are assessed as low. The Entity has conducted an EIA and internal assessment to identify Priority Ecosystem Services that are relevant to Affected Populations and Organisations. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the impacts on Biodiversity are assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the impacts on Biodiversity and Ecosystem Services are assessed as low and no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has implemented a management Policy and procedures to prevent the introduction of invasive species. Potential risks associated with their introduction through operations and logistics activities have been identified, and an assessment has evaluated their potential impact on Biodiversity and Ecosystem Services. Based on the Biodiversity assessment, the risk of introducing invasive species through the Entity's activities is considered extremely low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has a documented commitment to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	According to the Environmental Impact Assessment Report approved by the local environmental protection agency, no Protected Areas exist within the Entity's Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has embedded Human Rights commitments, including gender equality in the ASI Code of Conduct, which is communicated it to all Stakeholders. The Code is available at: http://cn.ahzjalufoil.com/upload/20250929144126.doc</p> <p>The Code is reviewed annually through management assessments to evaluate its implementation, with a commitment to promptly revise in the event of significant risks or control deficiencies.</p> <p>Through compliance and risk control procedures, the Entity has identified groups and organisations affected by its operations, including neighbouring enterprises and employees around the Facility, with its Human Rights risk assessment report confirming minimal impact. Communication with relevant groups is maintained through the industrial zone's management committee. No reports of adverse Human Rights issues have been received.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect women's rights, which are supported by a program that promotes gender equity and women's empowerment throughout the employment process. No complaints have been received from female Workers, and those interviewed are aware of their rights, with no negative feedback provided.</p> <p>The Entity's Policy commitment to Respecting Human Rights and Promoting Gender Equality is available at: http://cn.ahzjalufoil.com/upload/20250929150027.docx</p> <p>The Entity regularly assesses the program on gender equity and women's empowerment, with the report available at: http://cn.ahzjalufoil.com/upload/20250929145344.docx</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has established a process to identify sacred and cultural heritage sites and values within its Area of Influence, take appropriate actions to avoid or mitigate impacts, and ensure continued access to these sites. No sacred or cultural heritage sites or values are present within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites or values within the Entity's Area of Influence.

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9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it purchased the land from the local government which has not caused any resettlement or displacement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented compliance management and risk control procedures to mitigate health, safety, social, cultural, and environmental impacts. Collaborating with the Industrial Estate Management Committee and engaging Stakeholders, it develops management plans such as safety and environmental contingency plans and supports community welfare activities, including road safety, fire prevention, and fraud prevention campaigns.</p> <p>The primary impact on neighbouring populations is environmental, particularly air pollution from production activities. To address the primary environmental impact of air pollution from production activities, the Entity has developed an environmental control plan in compliance with legal standards and regularly reports progress to the Environmental Protection Agency. Relevant plans and reports are publicly accessible at: https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&dataid=082ac13f75e644bf84246e514e020b95</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity is committed to not using conflict minerals and has implemented a Management System that includes supply chain mapping, risk assessments, control plans, Due Diligence audits, and reporting. Relevant employees receive training, and the Policy and requirements are communicated to suppliers. All suppliers must sign a commitment letter affirming their pledge to avoid using conflict minerals.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity conducts a supply chain risk assessment to determine if materials originate from Conflict-Affected and High-Risk Areas (CAHRAs), based on supplier communications. The assessment report indicates that no materials come from such areas. All suppliers are based in China, and there are no critical Human Rights issues, such as Child Labour or Forced Labour within the Entity's supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's risk response is defined by the OECD Due Diligence Guidance for Minerals from CAHRAs. According to the risk assessment report, no materials originate from these areas, and no 'red flags' were identified in the supply chain. The Entity continues to maintain business relationships with all material suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>As part of the supplier Due Diligence process, the Entity has identified their major next-tier suppliers, established audit plans, conducted third-party audits at supplier sites, and applied CAHRAs as audit criteria. According to the risk assessment and supplier audit reports from 2024 and 2025, no materials are sourced from these regions, and the risk of conflict minerals is low.</p> <p>This ASI Performance Standard Audit also satisfies this requirement.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity publicly reports its supply chain Due Diligence performance on CAHRAs. The 2024 performance for CAHRAs is included in the 2024 Sustainability Report, page 29: http://cn.ahzjalufoil.com/upload/20250929144500.docx

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9.9 Security practice	Conformance	<p>The Entity has established a management procedure to ensure security activities respect Human Rights. Security guards are stationed solely at the entrance gate to manage visitors. They are not authorised to conduct body searches or restrict Worker movement. Security guards receive training, and one guard interviewed confirmed that they understand their duties and know how to uphold Human Rights.</p> <p>No grievances or complaints regarding security activities have been reported.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity demonstrates respect for the right to Freedom of Association and Collective Bargaining, allowing Workers' representatives to address their concerns with management on their behalf.
10.2a-c Child Labour	Conformance	Based on the Entity's work roster, site observations, and interviews with sampled Workers, the youngest employee in the Entity is currently 21 years of age. No Child Labour was found. In China, the minimum working age is 16, and the Entity has implemented a Policy against Child Labour. Employee ages are verified through identification card checks and interviews. Copies of identification cards are kept in personnel files as proof of the verification process.
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy prohibiting Forced Labour, slavery, and Human Trafficking. It is committed to ensuring compliance with this Policy and expects the same from its suppliers. Based on Worker and management interviews, document reviews, and site observations, the Entity does not engage in or support Forced Labour or Human Trafficking, either directly or indirectly. Workers are hired directly by the Entity, without having to pay any fees or deposits. No loans are provided to Workers, and they retain control over their identity documents. The Entity respects Workers' freedom of movement and imposes no unreasonable restrictions. Workers may freely terminate their employment with prior notice.</p> <p>The Entity's Modern Slavery Statement is available at: http://cn.ahzjalufoil.com/upload/20251226160308.docx</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination. Its recruitment advertisements and training plans emphasise that decisions are based solely on a candidate's ability to fulfil the requirements of the job, rather than on their personal characteristics. They also ensure that equal pay is given for equal work. Worker interviews confirm that all employees are treated equally, and no Discrimination cases have been reported.
10.5 Communication and engagement	Conformance	The Entity maintains direct and frequent communication with Workers and their representatives. It provides channels for Workers to raise complaints and concerns relating to working conditions, workplace issues, and compensation, ensuring there is no fear of reprisal,

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		intimidation, or Harassment. There are regular meetings between management and Worker representatives. All complaints and concerns are discussed at these meetings and responded to.
10.6a-g Violence and Harassment	Conformance	The Entity respects its employees, ensuring disciplinary measures comply with legal requirements and require confirmation from the involved Worker. It does not tolerate corporal punishment, mental or physical coercion, Harassment, gender-based Violence, including sexual Harassment, or verbal abuse. The Violence and Harassment Policy is included in the ASI Code of Conduct at: http://cn.ahzjalufoil.com/upload/20250929144126.doc
10.7a-c Remuneration	Conformance	The Entity's wage structure is clearly defined, with the basic wage meeting the local legal minimum. While no formal living wage standard has been established at the site, the current income levels adequately cover basic living requirements in the local area. Wage payments are documented, and all Workers are paid on time via bank transfer on the 15th of the following month. Payslips include detailed information on wages, allowances, Overtime compensation, and deductions.
10.8a-c Working Time	Conformance	Working hours are recorded manually. Office staff and 30% of Workers have a regular 40-hour working week, spread over five days. For the remaining 70% of Workers, there are three groups on two shifts, working six consecutive days followed by two days off. Shifts rotate every two days. The average workday does not exceed eight hours over a six-month period as confirmed on a sampling of records. Working hours are monitored to ensure compliance with China Labour Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides training courses on Workers' rights as part of the induction process when employees join the Entity, and refresher training is provided when legal requirements or the Entity's regulations change. The Employee Handbook contains a dedicated section on Workers' rights and is issued to all employees.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established and maintains an Occupational Health and Safety (OH&S) Management System that is continuously improved. The Entity holds a valid ISO 45001:2018 certification. On-site observations, document reviews, and interviews with management and Workers confirm the OH&S Management System is effective in preventing workplace hazards, ensuring a safe and healthy environment, and complying with relevant regulations and standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity regularly evaluates its OH&S Management System using various methods, including monthly safety meetings, annual legal Compliance reviews, internal audits based on ISO 45001:2018, and management review meetings. If a control gap is identified, a thorough analysis will be conducted to determine the need for corrective or preventive actions. This proactive approach ensures prompt resolution of any OH&S issues. Information on OH&S performance including leading and lagging indicators, is included in the 2024 Sustainability Report, pages 10-13: https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.a

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		hzjalufoil.com%2Fupload%2F20250901101021.docx&wdOrigin=BROWSELINK However, comparative analyses of performance with peer businesses and leading practices were not conducted.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has formed a Health & Safety Management Committee that holds regular meetings to monitor conditions and promote improvements in health and safety practices. To gather employee feedback on OH&S, the Entity has implemented various communication channels, including suggestion boxes, Worker representative assemblies, and a social media 'mini'-programme. These channels encourage employees to report and actively address health and safety concerns.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 March 2025	Initial Certification Audit – Provisional Certification
1	9 January 2026	Surveillance Audit and Scope Change – Full Certification Scope Change to include 'Aluminium Re-melting/Refining' to more accurately represent the Entity's relevant Supply Chain Activities