
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 2019

DATE OF EXPIRY

16 JULY 2022

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John', written over 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

Xiashun manufactures and sells foilstock, litho stock (CTP), capstock, 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.

Xiashun has its Headquarters in Haicang District, Xiamen (P.R. China) and three production facilities including: 1) Sheet Plant, Haicang District, Xiamen; 2) Haicang Foil Plant, Haicang District, Xiamen; 3) Huli Foil Plant, Huli District, Xiamen.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
ENTITY NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
CERTIFICATION SCOPE	<p>Xiashun manufactures and sells foilstock, litho stock (CTP), capstock, 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.</p> <p>Xiashun has its Headquarters in Haicang District, Xiamen (P.R. China) and three production facilities including: 1) Sheet Plant, Haicang District, Xiamen; 2) Haicang Foil Plant, Haicang District, Xiamen; 3) Huli Foil Plant, Huli District, Xiamen.</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">● Aluminium Re-melting/Refining● Casthouses● Semi-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)
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)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">● 20 May 2019 (Initial Certification Audit)● 28 August 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 - 26 April 2019)</u></p> <p>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 and finishing, at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.</p> <p>Supply chain activities included in the audit scope:</p>

- 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.

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 2019 – 16 July 2022

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

16 July 2022

CERTIFICATE
NUMBER

33

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. 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. Xiamen Xiashun conducts the compliance evaluation on an annual basis. Per the latest evaluation, no violation was 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 whistle-blowing channels are available to all interested parties. 4 cases were received in 2019, no cases in 2020 and 2021.
1.3 Code of Conduct	Conformance	A Code of Conduct which covers social and governance principles is established. 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 official website of the Entity at: http://www.xiashun.com/envpubfile/ASI8.pdf
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 at: http://www.xiashun.com/envpubfile/ASI1.pdf
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 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

CRITERION	RATING	COMMENT
		<p>website and posts on-site. More detailed information, please see: http://www.xiashun.com/envpubfile/ASI1.pdf For internal communication, the Entity uses the WeChat to publish all contents on ASI to all employees.</p>
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	<p>Xiamen Xiashun Aluminium Foil Co., Ltd. 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 by DNV GL on April 19-23, 2021. No major non-conformances were issued on the EMS and the Entity is actively analyzing the root causes of 10 minor non-conformances raised in the last audit and taking the required corrective actions.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>A documented Social Management Systems is established and implemented, covers the Haicang Foil Plant, Huli Foil Plant and Sheet Plant production facilities. The Entity obtains the ISO 45001:2018 certification, the latest audit was conducted on April 19-23, 2021, no major non-conformance was raised, 9 minor non-conformance. The Entity analyzed the root cause, established and implemented the associated corrective actions upon them.</p>
2.4 Responsible Sourcing	Conformance	<p>The Purchasing Policy is communicated to all suppliers and contractors and covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. Please see the responsible purchasing policy: http://www.xiashun.com/envpubfile/ASI1.pdf</p>
2.5 Impact Assessments	Conformance	<p>Environmental, social, cultural and Human Rights Impact Assessments are well implemented at various departments. The identified risks on social, environment, OH&S and governance are assessed. The latest</p>

CRITERION	RATING	COMMENT
		Impact Assessment on Human Rights, Labour Rights, and Governance was conducted in July 2021. The control measures for the identified risks are defined and implemented. There has not been any new projects or major 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, Labor Rights, Environment, Occupational Health and Safety are established, well implemented and trained.
2.7 Mergers and Acquisitions	Conformance	A procedure is established for mergers and acquisitions, but no such activity has happened since the ASI Management System started to operate in 2018.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment is established in accordance to the requirement of ASI Performance Standard. But no such case has happened since the ASI Management System started to operate in 2018.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Sustainability Report for the year of 2020 includes the information on the Entity's management practices and performance on company governance, impact on environment, human rights, the labor rights including occupational health & safety. The annual Sustainability Report for the year of 2020 is published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI12.pdf
3.2 Non-compliance and liabilities	Conformance	There were no non-compliance or liabilities recorded in the Sustainability Report in 2020. Per the official websites of the relevant government agencies and non-government organizations (NGOs), no such case was raised by the government agencies.
3.3a Payments to governments (legal and contractual)	Conformance	As per the financial audit report, reviewed by a third party on May 17, 2021, the payments to government 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.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Internal and external Whistle-blowing/ Complaint/Grievance mechanism exist (e.g. whistle blower hotlines, mail address, suggestion box). http://www.xiashun.com/envpubfile/ASI1.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Environmental Life Cycle Assessment is conducted. The assessment covers aluminium foils and sheets. The LCA is cradle-to-gate and the impact of the various production stages and of end-of-life recycling is assessed. The assessment is conducted in the format defined by the site, it does not follow ISO standards.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental Life Cycle Assessment reports for the two types of products are published on the Entity's official website and can be accessed by external parties at: http://www.xiashun.com/envpubfile/ASI2.pdf and http://www.xiashun.com/envpubfile/ASI9.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The environmental Life Cycle Assessment reports for the two types of products are published on the official website of the Entity at: http://www.xiashun.com/envpubfile/ASI2.pdf and http://www.xiashun.com/envpubfile/ASI9.pdf
4.2 Product design	Minor Non-Conformance	Following the product development process, the environmental impacts are taken into consideration. One minor non-conformance is issued as no target in the design and development process for new products in 2020 to enhance sustainability was established.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity established the management process for 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	Per the result of risk analysis, the process foil scrap in the Entity does not need 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-

CRITERION	RATING	COMMENT
		<p>conforming products at the customers' sites are returned to the Entity for recycling. But for the post-consumer scraps, from a financial and quality point of view, it is not possible to recycle in the foil manufacturing process.</p>
<p>O4.4b Collection and recycling of products at end-of-life (engagement)</p>	<p>Conformance</p>	<p>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.</p>
<p>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</p>		
<p>5.1 Disclosure of GHG emissions and energy use</p>	<p>Conformance</p>	<p>The major greenhouse gas emissions and energy use are tracked, calculated and documented annually. The information of 2020 GHG emissions are published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI20B.pdf The GHG emission report is not checked by a third party. The Entity publicly discloses environmental protection information in their annual Sustainability Report, under the Environmental Protection and Sustainable Development section. The annual Sustainability Report for the year of 2020 is published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI12.pdf</p>
<p>5.2 GHG emissions reductions</p>	<p>Conformance</p>	<p>The Entity sets out GHG emission reduction targets in 2021. In the plan, the main GHG emission sources are identified: electricity consumption and natural gas consumption. The associated measures are to reduce the electricity consumption by phasing out energy-intensive equipment, improve production process and others. The GHG emission target is published on: http://www.xiashun.com/envpubfile/ASI21A.pdf The Entity publicly discloses environmental protection information in their annual Sustainability Report, under the Environmental Protection and Sustainable Development section. The annual Sustainability Report for the year of 2020 is published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI12.pdf</p>

CRITERION	RATING	COMMENT
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	<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/controls to mitigate adverse impacts. The Entity publicly discloses air emissions information annually in their Environmental Information Disclosure Reports, under the Emissions information section, available via the following links:</p> <p>http://www.xiashun.com/envpubfile/ASI20C.pdf http://www.xiashun.com/envpubfile/ASI20E.pdf http://www.xiashun.com/envpubfile/ASI20G.pdf</p>
6.2 Discharges to Water	Conformance	<p>Discharges to Water is covered and managed within the Environmental Management System. The monitoring reports of wastewater discharge in 2019 and 2020 indicate all major pollutants were monitored, and results for these major pollutants meet the local legal discharge limit. The Entity publicly discloses wastewater discharge information annually in their Environmental Information Disclosure Reports, under the Emissions information section, available via the following links:</p> <p>http://www.xiashun.com/envpubfile/ASI20C.pdf http://www.xiashun.com/envpubfile/ASI20E.pdf http://www.xiashun.com/envpubfile/ASI20G.pdf</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>An assessment of risk areas of operations where Spills and Leakage may contaminate air, water and soil is done by following the risk assessment process of the Environmental Management System.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>Assessment and management of Spills and Leakage is defined in the Environmental Management System. Major spills and leakages will be handled and communicated by the emergency response team.</p>

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills and Leakage is defined in the Management Procedure of Information Disclosure. No spill or leakage occurred during 2019 or 2020. The Entity publicly discloses information in the 2019 and 2020 Social Responsibility Report, under the Environmental Protection and Sustainable Development section, via the following links: http://www.xiashun.com/envpubfile/ASI11.pdf http://www.xiashun.com/envpubfile/ASI12.pdf
6.4b Reporting of Spills (regular reporting)	Conformance	Reporting of Spills and Leakage is defined in the Management Procedure of Information Disclosure. No spill or leakage occurred in 2019 or 2020. The Entity publicly discloses information in the 2019 and 2020 Social Responsibility Report, under the Environmental Protection and Sustainable Development section, via the following links: http://www.xiashun.com/envpubfile/ASI11.pdf http://www.xiashun.com/envpubfile/ASI12.pdf
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. Xiamen Xiashun Aluminium Foil Co., Ltd. implemented 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	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity is registered in the Solid Waste Information management system and published on the following links: http://www.xiashun.com/envpubfile/ASI20C.pdf http://www.xiashun.com/envpubfile/ASI20E.pdf http://www.xiashun.com/envpubfile/ASI20G.pdf The Entity publicly discloses environmental protection information in their annual Sustainability Report, under the Environmental Protection and Sustainable Development section. The annual Sustainability Report for the year of 2020 is published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI12.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.

CRITERION	RATING	COMMENT
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 taken from the dross pressing will be recycled into the melting furnaces of Xiamen Xiashun Aluminium Foil. The remainder is sold to external dross processors to further extract the remaining Aluminium, which can be used to produce Aluminium alloying ingots and construction materials.
6.8b Dross (recycling)	Conformance	The Aluminium taken from the dross pressing will be recycled into the melting furnaces of Xiamen Xiashun Aluminium Foil. The remainder is sold to external dross processors to further extract the remaining Aluminium, which can be used to produce Aluminium alloying ingots and construction materials.
6.8c Dross (review of alternatives)	Conformance	The Entity reviews the internal dross processing method and dross sales channel on a yearly basis. No dross is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water source is municipal water supply. Usage is tracked and documented. The legally required Permit for Water Discharge into Public

CRITERION	RATING	COMMENT
		Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks are assessed. The level of water-related risk is low.
7.2a Water management (management plans)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Not Applicable	There were no identified significant water related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The Water-related risk assessment report is published on: http://www.xiashun.com/envpubfile/ASI6.pdf The Entity publicly discloses environmental protection information in their annual Sustainability Report, under the Environmental Protection and Sustainable Development section. The annual Sustainability Report for the year of 2020 is published on the official website of the Entity: http://www.xiashun.com/envpubfile/ASI12.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the Environmental Management System. Xiamen Xiashun Aluminium Foil Co., Ltd. is not within or close to any protected area, therefore the risk or impact by the operation of Xiamen Xiashun Aluminium Foil Co., Ltd. on biodiversity is very low. Further information, please see: http://www.xiashun.com/envpubfile/ASI5.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	There were revealed 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.

CRITERION	RATING	COMMENT
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's Human Rights and Business Ethics Policy commitment is set up and communicated to all employees. Further information, please see: http://www.xiashun.com/envpubfile/ASI1.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Right and tries to extend this commitment in the supply chain. The Due Diligence process is established covering 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 establishes and publishes the complaints/grievance channel to stakeholders and defines how to investigate the cases, take actions including the remedy measures. Currently no adverse impact is reported and no remedy is required.
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. Currently no complaint/grievance has been received from women workers.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples in the Certification Scope of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples in the Certification Scope of the Entity.
9.5 Cultural and sacred heritage	Not Applicable	There are no sacred or cultural heritage sites and values within the Entity’s Area of Influence.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no resettlement necessary in the site's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no resettlement necessary in the site's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The Entity makes a commitment to respect the rights and interests of local Communities. No complaints from local Communities were received.
9.7b Local Communities (impacts)	Conformance	The control measures for the identified impact on local Communities are established and implemented. No complaints from local Communities were received.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs people from local Communities, and prevents adverse impacts to their livelihoods. Per the interviewed worker from the local community, the remuneration and working condition in the Entity is satisfactory.
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. Further information, please see: http://www.xiashun.com/envpubfile/ASI1.pdf 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 the Conflict-Affected and High-Risk Areas. To date, no complaint on this issue has been received.
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 Management of Security Practice and Service 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. The Entity effectively investigated and dealt with one complaint regarding impolite behaviour effectively.

CRITERION	RATING	COMMENT
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 in the period of February 01, 2020 to January 31, 2022 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 3 complaints from January 2020 to now, the Workers' representatives are involved in the process of the investigation and implementation of actions.
10.2a Child Labour (minimum age)	Conformance	There is no Child Labour or young Workers in the Entity. The youngest worker at the site was born on October 12, 2002, joined on March 19, 2021.
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. Xiamen Xiashun Aluminium Foil Co., Ltd. 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 Forced Labour, slavery and human trafficking. All interviewed workers state they get the relevant training course about forced labour, and no case of forced labour is reported or known.
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. It is

CRITERION	RATING	COMMENT
		confirmed by worker interviews and review of records.
10.3c Forced Labour (migrant workers)	Conformance	Per record review, management and worker interviewed, there are no foreign Migrant Workers in Xiamen Xiashun Aluminium Foil Co., Ltd., all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in Forced Labour, and does not provide any type of loan to Workers. No case of debt bondage is found per worker interviews, review of records and internet search.
10.3e Forced Labour (freedom of movement)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is not involved in Forced Labour. There is no restriction of Workers' movement at site based on site observations and worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. 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' personal files, based on site observation, review of records and worker interviews.
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 3 days in the period of probation. Per worker interview and review of records, the freedom to terminate employment is respected.
10.4 Non-Discrimination	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. is committed to non-Discrimination. No case of Discrimination has been received or found by worker interviews and review of records.
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	Xiamen Xiashun Aluminium Foil Co., Ltd. respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of worker involved, and

CRITERION	RATING	COMMENT
		wages are not deducted or reduced for disciplinary reasons. It is confirmed by worker interviews, review of records and site observation.
10.7a Remuneration (living wage)	Conformance	Per review of records and worker interviews, the wage structure is clearly defined, the basic wage is above the legal minimum wage. The total payment meets the Workers' basic needs; 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	Conformance	The working hours are recorded and managed. Per site observation, worker interviews and review of records, the working hours are monitored 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.
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: http://www.xiashun.com/envpubfile/ASI12.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	Workers are provided the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them and their right to refuse unsafe work.

CRITERION	RATING	COMMENT
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 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	Conformance	Health and Safety targets and improvements are documented in the Occupational Health and Safety Program. Further information, please see: http://www.xiashun.com/envpubfile/ASI12.pdf

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.