
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**SHANGHAI SUNHO
ALUMINUM FOIL
CO., LTD.**

CERTIFICATE
NUMBER

19

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

28 FEBRUARY 2022

DATE OF EXPIRY

27 FEBRUARY 2025

CERTIFIED SINCE

28 FEBRUARY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a light green 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

Shanghai Sunho Aluminum Foil Co., Ltd. located in
Shanghai, China which manufactures aluminium
and aluminium alloy foils.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Shanghai Sunho Aluminum Foil Co., Ltd.
ENTITY NAME	Shanghai Sunho Aluminum Foil Co., Ltd.
CERTIFICATION SCOPE	Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which manufactures aluminium and aluminium alloy foils.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (21 – 25 January 2019)Surveillance Audit (15 – 17 September 2020)Re-Certification Audit (10 – 11 January 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">21 – 25 January 2019 (Certification Audit)15 – 17 September 2020 (Surveillance Audit)10 – 11 January 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 February 2019 (Certification Audit)19 October 2020 (Surveillance Audit)2 March 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Certification Audit (21 – 25 January 2019)</u> The audit scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision aluminium and aluminium alloy foils.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (15 – 17 September 2020)

The audit scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision aluminium and aluminium alloy foils.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Re-Certification Audit (10 – 11 January 2022)

The audit scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision aluminium and aluminium alloy foils.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

28 February 2022 – 27 February 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

27 August 2023

CERTIFICATE
NUMBER

19

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 that conform to ASI Performance Standard's legal compliance requirements. The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established policies and procedures on Anti-Corruption, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has appointed an Anti-Corruption Commissioner.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, communication to raise awareness of the Code among business partners and suppliers. More information can be found via: http://www.shalfoil.com/NewsDetail.aspx?ID=2813
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Policies are consistent with the environmental, social, and governance practices included in the ASI Performance Standard. For further information, please see: http://www.shalfoil.com/NewsDetail.aspx?ID=2813
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented Policies. The Policies are reviewed in the annual management review meeting.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal stakeholders through training and display on-site and available for external stakeholders via the website: http://www.shalfoil.com/NewsDetail.aspx?ID=2813
2.2 Leadership	Conformance	A senior Management Representative has been appointed, and the responsibility and authority are clearly defined.
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.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Due Diligence audits at major next tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. The responsible purchasing policy is published on: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are implemented in accordance to the ASI Performance Standard requirements, ISO 14001 and ISO 45001 Management System standards and the relevant legal requirements.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans on social, OH&S and environmental accidents are implemented. Workers are provided with training and drills are undertaken.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions; however no such activity has occurred since the Entity commenced operations at the location in 2004.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment; however no such activity has occurred since the Entity commenced operations at the location in 2004.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publishes an annual Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=2959 The report is written in the company format and is not verified by a third party.
3.2 Non-compliance and liabilities	Minor Non-Conformance	The Entity publicly discloses legal compliance information in the Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=2959 However, the Entity did not disclose information and rectification measures in relation to the penalty for failing in the management of Workers' individual occupational health files as required.
3.3a Payments to governments (legal and contractual)	Conformance	Payments to government are included in the Finance Report, which is audited by a third party. All payments are made in accordance with all legal requirements.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has internal and external Complaints Resolution Mechanisms, including a whistleblower hotline, email address and an on-site suggestion box. The available channels are communicated to stakeholders.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The environmental Life Cycle Assessment (LCA) is conducted and documented, covering all Aluminium products and product lines.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental Life Cycle Assessment (LCA) provides cradle-to-gate information covering all Aluminium products and product lines. The LCA can be provided by external communication if required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Life Cycle Assessment (LCA) is published on the Entity's website: http://www.shalfoil.com/NewsDetail.aspx?ID=2840 The Entity defines how to communicate on the LCA with the customer in the Management Procedure of Information Disclosure.
4.2 Product design	Conformance	Following the product development process, the environmental impacts are taken into consideration. Energy consumption, waste reduction and recycling are taken into consideration at the stage of product development. The target for these aspects are defined.
4.3a Aluminium Process Scrap (targets)	Conformance	Aluminium Process Scrap is collected and packaged, sold to a smelter or other manufacturer of construction materials for recycling. The recycling rate is 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	In accordance with the result of material analysis, the Entity's Aluminium Process Scrap does not require separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Customers return non-conforming products to the Entity for re-work or cutting into a smaller size for re-use. For process scrap generated by the customers or at the end-of-life, it is not viable from a financial or quality perspective to recycle scrap in the foil manufacturing process.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	As there are no local, regional or national collection and recycling systems for aluminium scraps in China,

CRITERION	RATING	COMMENT
		the Entity is working with customers to decide how to improve the recycling rate of products at end-of-life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Energy consumption and the major relevant Scope 1 and 2 Greenhouse Gas (GHG) emissions are tracked and documented: http://www.shalfoil.com/NewsDetail.aspx?ID=2956 The GHG emissions are not third party verified.
5.2 GHG emissions reductions	Conformance	The Entity establishes an annual GHG emission target. The 2020 target is to reduce GHG emissions by 10 tonnes CO ₂ -eq GHG compared with 2019 levels. The main strategy is to reduce the electricity consumption and improve the capacity of annealing ovens. The target was achieved. The GHG emission target for 2021 is published at: http://www.shalfoil.com/NewsDetail.aspx?ID=2958
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The waste air generated in the operation and kitchen is collected and treated before released. Emissions to Air are monitored periodically and meet the local emission limit.
6.2 Discharges to Water	Conformance	Discharges to Water is covered and managed within the Environmental Management System. Water discharge meet the local legal limit. The wastewater discharge is monitored periodically and meets the local discharge limits.
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 undertaken by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of Spills and Leakage is defined in the Environmental Management System. Major Spills and Leakages are handled and communicated by the emergency response team.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills is defined in the Entity's Management Procedure of Information Disclosure. There has been no Spill in the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of Spills and the remediation actions taken are published in the annual Sustainability Report. There has been no Spill in the past three years.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System. The transfer of Hazardous Waste is audited and 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 reported in the Sustainability Report, Chapter 7: http://www.shalfoil.com/NewsDetail.aspx?ID=2959
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.

CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water source is the municipal water supply. Usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System is granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks have been assessed. The level of water-related risk is low.
7.2a Water management (management plans)	Conformance	Water consumption reduction targets are established and the associated control measures are defined and documented.
7.2b Water management (monitoring)	Conformance	Water consumption is monitored and progress toward achievement of the water-related targets is assessed. The reduction target in 2021 was not achieved and the Entity has analysed the root cause and established and implemented corrective actions.
7.3 Disclosure of water usage and risks	Conformance	In accordance with the Entity's Management Procedure of Information Disclosure, the water-related risk assessment report is published: http://www.shalfoil.com/NewsDetail.aspx?ID=2957
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The biodiversity assessment is included in the Environmental Management System. The Entity is not in or close to any Protected Area and the impact on biodiversity from the Entity's operations is very low. For further information, please see: http://www.shalfoil.com/NewsDetail.aspx?ID=2811
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations is very low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations is very low.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations is very low.

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	The main carrier medium (wooden pallets) 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 implemented a Policy commitment to respect Human Rights and communicates the policy to all employees: http://www.shalfoil.com/NewsDetail.aspx?ID=2959
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 is established covering the supply chain including employment (labour) agencies and sub-contractors.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and publishes the complaints/grievance channel to stakeholders. There has been no case of the Entity have caused or contributed to Human Rights impact reported.
9.2 Women’s Rights	Conformance	Women’s legal rights and interests are respected. 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 Entity’s Certification Scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the Entity’s Certification Scope.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable 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 there is no Resettlement necessary.

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no Resettlement necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of local Communities. There has been no complaint received from the local Community. An interviewed worker from the local Community states the Entity has a good relationship with local Community.
9.7b Local Communities (impacts)	Conformance	The Entity has established and implements control measures for the identified impacts on local Communities. There has been no complaint received from the local Community.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs people from the local Community which supports their livelihoods by providing local employment opportunities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment prohibiting the use of conflict minerals and communicates this through the aluminium value chain. Further information, please see: http://www.shalfoil.com/NewsDetail.aspx?ID=2816 There has been no complaint received on this issue.
9.9 Security practice	Conformance	The Entity implements security practices that respect Human Rights. Responsibilities and authorities are clearly defined in the security agreement and security staff undergo relevant training. No complaint or grievance regarding security staff or practices has been received.
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. The Entity commits itself to respect Workers' rights. There are 54 elected Worker representatives including eight women, and a 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 Collective Bargaining in China. However, the Entity respects the rights of Workers to Collective Bargaining. There are no Collective Bargaining Agreements in the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers can access the suggestion box, email, hotline or directly communicate with management to report their concerns or complaint.
10.2a Child Labour (minimum age)	Conformance	In accordance with the review of records and management and worker interviews, the Entity does

CRITERION	RATING	COMMENT
		not use nor support the use of Child Labour or young workers.
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. The Entity strictly follows the local legal requirements.
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 and protection of young workers.
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.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. Workers are not required to provide any form of deposit; recruitment fee or equipment advance.
10.3c Forced Labour (migrant workers)	Not Applicable	This Criterion is not applicable as 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 loans to Workers. There is no case of Debt Bondage reported or found.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' movement at the Entity.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of Workers' original documents, only copies of original documents are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The notice period 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.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers representatives is established. As per the Trade Union Committee meeting minutes and worker and management interviews, communication is conducted and effective.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, disciplinary measures are not related to inhumane actions,

CRITERION	RATING	COMMENT
		harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation, and require the confirmation of involved Worker.
10.7a Remuneration (living wage)	Minor Non-Conformance	The wage structure is clearly defined and the basic wage is above the legal minimum wage. The total payment meets the Workers' basic need. Payslips are provided to Workers in private via a digital application and include all required information. However, it was identified that the Entity had not enrolled all dispatch and subcontractor Workers in the social insurance program as required.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and timely paid to all Workers by bank transfer on 15 th of the following month. Payslip are provided to Workers in private via a digital application and include all required information.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded manually. Working hours are monitored, the total working hours in a quarter do not exceed 608 and the monthly overtime working hours do not exceed 36. However, it was identified that a small number of Workers had worked excessive overtime during the working day.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety Policy, which is reviewed periodically and communicated with stakeholders. Further information, please see: http://www.shalfoil.com/NewsDetail.aspx?ID=2813
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 (OH&S) 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. The latest legal compliance evaluation was conducted in December 2021. There were no violations of OH&S issues raised.
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 the 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.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirements and the OH&S Management System, the Entity has a system of Workers' consultation and participation in health and safety. Union representatives participate the health and safety meeting periodically and management responds to the concerns and advice 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. For further information, please see: http://www.shalfoil.com/NewsDetail.aspx?ID=2959

Document Control and Version History

Revision	Date	Notes
0	28 February 2019	Issued
1	30 October 2020	Surveillance Audit
2	2 June 2021	Updated to reflect a change in the name of the Member to Shanghai Sunho Aluminum Foil Co.,Ltd.
3	30 March 2022	Re-Certification Audit; Adjust Certification Scope wording to improve legibility.