

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Kunshan Aluminium Co., Ltd.

CERTIFICATE NUMBER

74

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

26 FEBRUARY 2023

DATE OF EXPIRY

25 FEBRUARY 2026

CERTIFIED SINCE

26 FEBRUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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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

Kunshan Aluminium's facility at No
269, Nijiabang Road, Luyang,
Zhoushi Town, Kunshan City,
Jiangsu Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kunshan Aluminium Co., LTD.
ENTITY NAME	Kunshan Aluminium Co., LTD.
CERTIFICATION SCOPE	Kunshan Aluminium's facility at No 269, Nijiang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (23 – 24 December 2019)Surveillance Audit (10 – 11 August 2022)Re-Certification Audit and Scope Change (5 June – 6 June 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">23 – 24 December 2019 (Initial Certification Audit)10 – 11 August 2022 (Surveillance Audit)5 June – 6 June 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">15 January 2020 (Initial Certification Audit)8 November 2022 (Surveillance Audit)14 July 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 24 December 2019)</u></p> <p>Kunshan Aluminium Co., Ltd.'s business scope includes the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products. The company was registered in July 2004 with a registered capital of 443.8 million RMB and a total investment of 960 million RMB. The company's double zero aluminium foil design capacity of 35,000 tons / year, product width of 1920mm, products include food, cigarettes, medicine, daily necessities, cosmetics and other high-end packaging foil and high-grade foil for the electronics industry.</p> <p>The 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> <p><u>Surveillance Audit (10 – 11 August 2022)</u></p> <p>The audit scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.</p> <p>The supply chain activities included in the audit scope:</p>

-
- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (5 June – 6 June 2023)

The audit scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.

The supply chain activities included in the audit scope:

- Material Conversion

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 26 February 2023 – 25 February 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 25 February 2025

CERTIFICATE NUMBER 74



If you have an inquiry or complaint about this Certification, go to the third-party Ethics Point 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

Kunshan Aluminium Co., Ltd. was founded in July 2004. It is jointly funded by Hanjiang Group Company Holding and Hong Kong Hanhe Industrial Development Co., LTD, with registered capital of 443.8 million yuan and a project investment of 960 million yuan. The company is located in Kunshan City, Jiangsu Province, China with geographical, human resources, and logistics (seaport) advantages.

The company is a professional aluminium foil manufacturing enterprise, covering an area of 135,000 square meters with the main plant covering 45,000 square meters. The company uses world-class production equipment by ACHENBACH, KAMPF /WT, HERKULES and other manufacturers. The company's annual output of thin aluminium foil is 35,000 tonnes, which is used for food packaging, cigarettes, medicine, daily necessities, cosmetics and other high-grade packaging foil and electric power and electronic industry foil.

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	<p>The Entity has collected and identified the applicable legal requirements and other requirements, and conducts a compliance evaluation on an annual basis. No fine or request for corrective action has been issued from the government agencies or other stakeholders. More information on the legal compliance assessment is available in the Sustainability Report via the link below:</p> <p>http://www.akscn.net/Upload/files/ksly2306-14.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent Corruption and personnel are trained in these processes as verified through training records. The Entity works against Corruption in all its forms, including extortion and bribery, consistent with Applicable Law and prevailing international standards. The Entity also has a Policy for Labour and Business Ethics:</p> <p>http://www.akscn.net/Upload/files/ksly202306-03.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Code which includes principles relevant to environmental, social and governance performance. All employees are provided with the training on the Code of Conduct. The ASI Management Manual stipulates that the Code of Conduct shall be reviewed in case of Material, environmental, social and governance risk(s) caused by business changes or any indication of control gap and shall be reviewed at least once every five years. The Code of Conduct is published on the Entity's website:</p> <p>http://www.akscn.net/Upload/files/ksly202306-01.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>Systems, procedures and processes that conform to the environmental, social, and governance policies requirement are developed and well implemented. For further details, please see the ASI Management Policy:</p> <p>http://www.akscn.net/Upload/files/ksly202306-02.pdf</p>
2.2a-c Leadership	Conformance	<p>Senior management demonstrate commitment to the implemented Policies.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has an Environmental Management System in place and holds a valid ISO 14001: 2015 certificate.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>A Social Management System is established and implemented. The Entity has established the documented management procedures that addresses Human Rights and Labour Rights and for Occupational Health and Safety, the Entity's Management System is certified to ISO 45001:2018.</p>

CRITERION	RATING	COMMENT
2.4a-e 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 purchasing Policies are accessible at: http://www.akscn.net/Upload/files/ksly202306-09.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	Not applicable as no new project or major change to existing Facility since the Entity joined ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	Not applicable as no new project or major change to existing Facility since the Entity joined ASI.
2.7a-f Emergency Response Plan	Conformance	The Entity has established a Business Continuity and Resumption Plan that addresses situations including fire, earthquake, hazardous chemical leak, extreme weather, labour shortage, and key equipment breakdown. The well-established emergency response plans are developed in collaboration with potentially affected Stakeholder groups such as Communities and Workers and their representatives. The Entity has established an emergency response plan for EHS issues, which is registered with the relevant government agencies. Employees are provided with the relevant training and the exercises are conducted for fire/evacuation and chemical leaks. The emergency response plan is publicly available: http://www.akscn.net/Upload/files/ksly202306-08.pdf
2.8a-d Suspended Operations	Conformance	The Business Continuity and Resumption Plan is well established, formally reviewed and approved by senior management.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions, however no such activity has occurred since 2019.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment, however no such case has occurred since 2019.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published the 2022 Sustainability Report on its website: http://www.akscn.net/Upload/files/ksly2306-14.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2022 Sustainability Report: http://www.akscn.net/Upload/files/ksly2306-14.pdf
3.3a-c Payments to Governments	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is published in the Entity's Annual Report:

CRITERION	RATING	COMMENT
		http://www.akscn.net/Upload/files/ksly202306-07-333.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Complaints Resolution Mechanism for internal and external complaints, grievances and requests for information e.g., whistleblower hotline, mail address, and suggestion box. Please refer to the following: http://www.akscn.net/Upload/files/ksly2306-20(1).pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has conducted and documented an environmental Life Cycle Assessment (LCA). The LCA Report is published on the website: http://www.akscn.net/Upload/files/ksly202306-04.pdf However, the LCA does not include the upstream Aluminium material data.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has provided adequate cradle-to-gate LCA information on its Aluminium Product. The LCA Report is publicly available. http://www.akscn.net/Upload/files/ksly202306-04.pdf
4.2 Product Design	Conformance	The Entity integrates relevant objectives in the design and development process for Products to enhance sustainability, including the life cycle impacts of the end Product. http://www.akscn.net/Upload/files/ksly202306-04.pdf
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimized the generation of Aluminium Process Scrap within its own operations and, where generated targets 100% of scrap for collection, recycling and/or re-use. The Entity separates Aluminium alloys and grades for recycling. The generated target for the Process Scrap utilization rate is 100%. The Entity's Aluminium Process Scrap recycling strategy is accessible via the following link: http://www.akscn.net/Upload/files/ksly2306-16.pdf
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity is communicating with its main customer to discuss how to improve the recycling rate of Products at End of Life. The generated target for process scrap utilization rate is 100%. The Entity's Aluminium Process Scrap recycling strategy is accessible via the following link: http://www.akscn.net/Upload/files/ksly2306-16.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	As there is not the complete local, regional or national collection and recycling systems for Aluminium scrap in China, the Entity is working with its customer to decide how to improve the recycling rate of Products at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The major Scope 1 and 2 Greenhouse Gas (GHG) Emissions and energy use by source are tracked, calculated and documented annually. The Entity publicly discloses verified energy use and GHG emissions by source data for 2022 on the Entity's website: http://www.akscn.net/Upload/files/ksly-23071302.pdf

CRITERION	RATING	COMMENT
		http://www.akscn.net/Upload/files/ksly-23071301.pdf
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-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has committed to green and low carbon development and alignment with a 1.5°C warming scenario. The Entity has defined its GHG emission reduction approaches and the management program is disclosed:</p> <p>http://www.akscn.net/Upload/files/ksly2306-14.pdf</p> <p>However, the GHG Emissions Reduction Plan does not include detail for all Direct and Indirect GHG emissions.</p>
5.4 GHG Emissions Management	Conformance	The Entity has compiled the GHG Emissions Reduction Plan to define the management approaches for GHG emission reduction, with the main focus on energy management. Per site observation, document review and interview, following the Plan-Do-Check-Action approach, the Entity manages energy consumption and monitors the management system performance to achieve the GHG Emissions Reduction Plan targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's waste air generated is collected and treated prior to release. Emissions to Air meet the local discharge limits. The Entity has implemented an air emission management program with actions/controls to mitigate adverse impacts in accordance with the requirements of ISO 14001:2015. The Entity publicly discloses Emissions to Air from its activities and, where possible, from those within its Area of Influence on an annual basis. Implementation plans to minimise exposure to, and impacts from emissions to air are set, periodically reviewed and publicly disclosed. The Entity discloses the target and management program:</p> <p>http://www.akscn.net/Upload/files/ksly2306-14.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are managed within the Environmental Management System. The Entity's wastewater monitoring reports for 2022 and 2023 indicate that the wastewater discharges meet the local legal discharge limits. The Entity discloses the target and management program:</p> <p>http://www.akscn.net/Upload/files/ksly202306-23.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	In accordance with the Environmental Management System and legal requirements, the Entity has established the management procedures for Spills and Leakage. The relevant trainings are provided to Workers, and drills are conducted at least annually. The latest version of the management plan is disclosed:

CRITERION	RATING	COMMENT
		http://www.akscn.net/Upload/files/ksly2306-21.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and Leakage is defined in the Entity's environment protection management procedure. No Spills have occurred in the past three years. The latest version of the management plan is disclosed: http://www.akscn.net/Upload/files/ksly2306-21.pdf
6.5a-c Waste Management and Reporting	Conformance	Waste management is addressed within the Entity's Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates material impacts by re-using and re-cycling the wastes. The disposal of Hazardous Waste is in compliance with applicable legal requirements. The Entity has publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated from its activities in 2022: http://www.akscn.net/Upload/files/ksly2306-14.pdf
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and documented its water withdrawal and use by source and type within the Environmental Impact Assessment. Water-related risks, considering the surrounding water environment, water withdraw and discharge, and the effectiveness of existing management measures are assessed and the risk is low. The Entity has disclosed an Assessment Report of Water-Related Risks: http://www.akscn.net/Upload/files/ksly202306-011.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as there are no material water-related risks in the Entity's Area of Influence. The Entity has implemented a management plan for wastewater.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A risk and impact assessment on Biodiversity and Ecosystem Services is included in the Environmental Impact Assessment (EIA), which was conducted by qualified third parties and approved by the local Environment Protection Agency. Per the approved EIA, there are no biodiversity-sensitive areas in the Entity's Area of Influence and the risk level is low. The Entity is located within an industrial zone planned by the local government and has implemented an effective Environmental Management System.
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable, as the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low, as per the Environmental Impact Assessment approved by

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		local environment protection agency. No Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the risks and potential impacts identified are assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has identified the risk of the introduction of Alien Species in its operational and logistics activities and assessed the activities that could have Material adverse impacts on Biodiversity and Ecosystem Services. The risk is low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	In the management manual, the Entity commits to protecting the environment. There are no Protected Areas in 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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its size and circumstances. The Entity has established and published a complaints/grievance channel to Stakeholders. The risk assessment process is established to address the supply chain and social audits are conducted on major material suppliers based on the requirement of Due Diligence processes.</p> <p>Where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it cooperates in their remediation through legitimate processes. The Entity's ASI Policy is publicly disclosed:</p> <p>http://www.akscn.net/Upload/files/ksly202306-01.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	Women's legal rights and interests are respected by the Entity. The Entity has implemented policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy is in place (refer to the Entity Code of Conduct) and is communicated to all employees.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence as per the assessment report and definition specified in the ASI Performance Standard. However, the

CRITERION	RATING	COMMENT
		Entity has established and implemented policies and processes to ensure respect of the rights and interests of Indigenous Peoples.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity commits to respect Indigenous Peoples rights.
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, as there are no Indigenous Peoples within the Entity's Area of Influence and Free, Prior and Informed Consent (FPIC) has not been required.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has a procedure in place to identify cultural and sacred heritage, and conduct risk assessments to reduce the impact on any sites. At present, all of the Entity's existing projects have undergone environmental and social impact assessment, and there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no sacred or cultural heritage sites in the Entity's Area of Influence, nor presence of Indigenous Peoples or their lands, territories and resources.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity is in an industrial zone that has been developed by the local government and no resettlement was required. Additionally, the Entity has had no New Projects since 2012.
9.7a-h Affected Populations and Organisations	Conformance	<p>Based on the results of the Human Rights Due Diligence and a general risk assessment undertaken with consideration of the rights and interests of Local Communities, environmental pollution was the only identified adverse impact on Local Communities. Plans have been implemented to mitigate adverse impacts.</p> <p>The Entity takes appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities, with control measures for the identified impacts established and implemented.</p> <p>The Entity has a proactive approach to working with Local Communities and neighbourhood organizations to improve and support mutual interests. Further information on community engagement is available in the Sustainability Report:</p> <p>http://www.akscn.net/Upload/files/ASI2022.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Not Applicable	This Criterion is not applicable, as the Entity does not source directly or indirectly any Bauxite, Alumina or primary Aluminium.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable, as the Entity does not source directly or indirectly any Bauxite, Alumina or primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the Entity does not source directly or indirectly any Bauxite, Alumina or primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable, as the Entity does not source directly or indirectly any Bauxite, Alumina or primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable, as the Entity does not source directly or indirectly any Bauxite, Alumina or primary Aluminium.
9.9 Security practice	Conformance	All security guards are the Entity's employees. The Entity commits to respect Human Rights in security activities, including not permitting body searches and security guards to work in humane ways. All security guards understand their tasks and the way to respect Human Rights. No grievance or complaint relating to security activities has been received to date.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	In accordance with the 'Trade Union Law of the People's Republic of China (2021)', the All-China Federation of Trade Unions is the sole legal organization for trade unions. The All-China Federation of Trade Unions and its constituent trade union organizations represent the interests of workers and lawfully safeguard the legitimate rights and interests of workers. The Entity is a state-owned company; the top management commits to respect the right of freedom of Association and Collective Bargaining. All employees of the Entity have joined the trade union, the regular communication meeting between trade union and top management is conducted to communicate and negotiate the rights and benefits of employees. Collective bargain agreement and female worker special protection contract with the Entity are signed and approved by top management. The trade union chairman, committees' member and employee representatives are all freely elected by employees.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The top management commits to respect the right of freedom of Association and Collective Bargaining. Workers' representatives are freely elected by employees every five years, worker representative congress meeting is regularly held once a year, workers' concerns are communicated and discussed with top management in the meetings. Collective bargain agreement with the Entity is signed and approved by top management.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in China, and 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 in the Entity, the youngest Worker was 20 years old. The policy of not using Child Labour is established and the Entity commits itself,

CRITERION	RATING	COMMENT
		and expects its suppliers, to comply with the prohibition of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in nor tolerates Human Trafficking either directly or through any employment or recruitment agencies. The policy of prohibition of forced labour including human traffic is established and communicated internally and to the suppliers. The Entity commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking.</p> <p>The Entity is not involved in any form of forced labour and does not provide loans or credit to workers. Workers are not required any form of deposit, recruitment fee or equipment in advance, no illegal deduction. The training course on forced labour is provided to all employees.</p> <p>No foreign migrant workers in the company, all workers are Chinese. The Entity does not unreasonably restrict the freedom of movement of workers in the workplace or in on-site housing. Workers are free to leave the factory when not engaged in work; Workers move freely when needed to access basic liberties, such as go to toilet, drink water, medical treatment.</p> <p>The annual Modern Slavery Statement is publicly published on the official web site and could be found via http://www.akscn.net/Upload/files/20230515.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity has Policies and procedures in place that effectively ensure equal opportunities and it does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.
10.5 Communication and engagement	Conformance	The Entity has implemented operating procedures that ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment. There are regular meetings between the Trade Union and the Entity's senior management. The Entity has established a grievance and complaints hotline and email.
10.6a-g Violence and Harassment	Conformance	<p>The Entity respects its employees, disciplinary measures are in compliance with legal requirements and require the confirmation of involved worker. The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers.</p> <p>The Violence and Harassment Policy is publicly published on the official web site and could be found via http://www.akscn.net/Upload/files/20230515.pdf</p>
10.7a-d Remuneration	Minor Non-Conformance	<p>The Entity's wage structure is clearly defined, and the basic wage meets the legal minimum requirement. The total payment meets the Workers' basic need.</p> <p>However, one minor non-conformance is issued related to the incorrect overtime compensation rate paid to Workers by the Entity.</p>
10.8a-c Working Time	Conformance	Working hours are recorded by finger-scanning meter. Working hours are monitored and the monthly Overtime working hours do not

CRITERION	RATING	COMMENT
		exceed the legal monthly limit. Workers receive at least one day off per week.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their rights and has established cooperation and communication with the Workers. National laws and regulations in China are respected and complied with.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, maintained and continually improved the Occupational Health and Safety (OH&S) Management System. The OH&S Management System is certified to ISO 45001:2018. As per site observation, document review and management and worker interviews, the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The member periodically reviews the OH&S Management System during monthly safety meetings, the annual legal compliance evaluation, annual internal audit and the management review meeting. When any indication of a control gap is shown, a review is conducted to assess if the potential corrective and/or preventive actions should be implemented.</p> <p>The achievement of OH&S objectives/targets in 2022 and the comparative analyses of performance with peer Businesses and leading practice are disclosed:</p> <p>http://www.akscn.net/Upload/files/ksly2306-14.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a system of Workers' consultation and participation in health and safety. The Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Workers' representative and management responds to the concerns of Workers.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	26 February 2020	Issued (Full Certification)
1	29 March 2021	Revised to correct public headline statements relating to Criteria 9.3, 9.4, 9.5, 9.6a and b.
2	15 December 2022	Surveillance Audit
3	27 September 2023	Re-Certification Audit and Scope Change – Full Certification.

Scope change to apply V3.

A five-month extension was granted to the Initial Certification Period as a result of Covid / main contact change
