

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Jiangsu Huafeng Aluminum Industry Co., Ltd.

CERTIFICATE NUMBER
336

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
3 OCTOBER 2023

DATE OF EXPIRY
2 OCTOBER 2026

CERTIFIED SINCE
3 OCTOBER 2023

AUTHORISED BY

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

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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

Jiangsu Huafeng Aluminum
Industry Co., Ltd located in Zhoubo
Road, Economic Development
Zone, Pei Xian, Jiang Su, China, for
the manufacture of aluminium
plate strips and aluminium foil
blanks.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Jiangsu Huafeng Aluminum Industry Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Huafeng Aluminum Industry Co., Ltd located in Zhoubo Road, Economic Development Zone, Pei Xian, Jiang Su, China, for the manufacture of aluminium plate strips and aluminium foil blanks.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Material Conversion
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 7-8 September 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 26 September 2023
AUDIT SCOPE	<p>The Audit Scope covers the facility of Jiangsu Huafeng Aluminum Industry Co., Ltd. for the manufacture of aluminium plate strips and aluminium foil blanks.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Material Conversion <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	3 October 2023 - 2 October 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 3 October 2025

CERTIFICATE NUMBER 336



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

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

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

ENTITY OVERVIEW

Jiangsu Huafeng Aluminum Industry Co., Ltd. was founded in January 2008 and is located in Peixian Economic Development Zone, Xuzhou, Jiangsu. It covers an area of 266 acres and has a registered capital of 360 million yuan. It has built an annual production capacity of 50000 tons of aluminium sheets and strips. Its primary clients are famous aluminium foil production enterprises both domestically and internationally. The Entity provides customers with high-quality cast-rolled and hot-rolled aluminium foil blanks of various alloys, thicknesses, and widths.

Jiangsu Huafeng Aluminum Industry Co., Ltd. is a subsidiary of Jiangsu Zhongji Composite Materials Co., Ltd., which is a leading domestic enterprise producing high-precision aluminium foil. Jiangsu Zhongji is a wholly owned holding enterprise of Wanshun New Materials, a national high-tech enterprise established in 1998, headquartered in Shantou Free Trade Zone, Guangdong Province. It integrates three major businesses: environmentally friendly packaging materials, high-precision aluminium foil, and functional films. In February 2010, the company was listed on the Shenzhen Stock Exchange Growth Enterprise Board.

Jiangsu Huafeng Aluminum Industry Co., Ltd. has world-class and domestically leading modern production equipment, including a 2000mm wide six-roll cold rolling mill, four inclined casting and rolling mills equipped with automatic thickness and plate shape control systems, as well as precision equipment such as annealing furnaces and recoilers, oil mist recovery, dust removal and environmental protection equipment. They adhere to high standards and strict management and have successfully passed ISO9001, ISO14001, ISO45001, and IATF16949 system certifications, improving the standardised and refined management level of the enterprise.

Jiangsu Huafeng Aluminum Industry Co., Ltd. adopts an advanced Mitsui online degassing plate filtration device from Japan. Through quality assurance measures such as "double refining, double stirring, double degassing, double filtering, and double refining", the grain size, degassing, and trace elements of cast and rolled aluminium coils are well controlled, and the internal quality is stable. The control system of the cold rolling mill adopts an imported AGC thickness and AFC plate shape automatic feedback control system, equipped with a German BFI pressure magnetic plate roller and x-ray thickness gauge. The cold-rolled finished coil has a flat plate shape, uniform thickness, stable mechanical performance, and good surface quality, which can fully meet the production quality requirements of downstream users for 0.005mm grade aluminium foil.

Jiangsu Huafeng Aluminum Industry Co., Ltd. adheres to the business philosophy of 'people-oriented, technology first, based on environmental protection, and serving society' and is committed to building partnerships worldwide. Huafeng welcomes domestic and foreign users, peers, and suppliers to exchange ideas and collaborate.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures, and processes to comply with the legal requirements. The legal compliance department is responsible for the implementation of Applicable Laws, regulations and other requirements within the Entity and conducts legal compliance review yearly. The Entity has fully identified Applicable Laws, regulations, and other requirements, including customer requirements. There are no significant compliance issues within the Entity. Information regarding compliance performance is disclosed in the Annual Sustainability Report: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf
1.2 Anti-Corruption	Conformance	Policies and processes such as the Management Procedure of Anti-Corruption to identify and prevent Corruption are developed and implemented. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing standards. As evidenced in registers of misconduct and periodical internal control audit reports, there has been no Corruption case reported in 2022 and 2023.
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented a Code of Conduct which includes principles related to environmental, social and governance performance. The Entity has implemented adequate measures, including training, and communication to raise awareness of the code among business partners and suppliers. A formal review of the Code of Conduct is conducted annually, and the Entity will review the conformance with, and the effectiveness of the Code of Conduct when there are any changes to the business that bring about significant changes in environmental, social and governance risks, or there are indications of control deficiencies. The Code of Conduct is available for all interested Stakeholders at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241833549012.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Management Policy is consistent with environmental, social, and governance practices. The Policy is communicated to all employees internally and publicly disclosed in the Sustainability Report: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf The Entity reviews the Policy annually as well as when there are any changes to the business that bring about significant changes in environmental, social and governance risks, or there are indications of control deficiencies.
2.2a-c Leadership	Conformance	The Director of the General Manager's office of the Entity is assigned as the ASI Management Representative and is responsible for the establishment and implementation of the ASI Performance Standard. The Management Representative is responsible for communicating ASI Policies within the Entity. A cross-departmental ASI working group is established to implement ASI Standards within the Entity, ASI policies

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		and management procedures are communicated to all employees through various training courses.
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.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System in accordance with ASI Performance Standard requirements. Social impacts and relevant risks such as risks relating to Human Rights, Occupational Health and Safety, and business ethics are identified and assessed. The associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	<p>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 responsible sourcing requirements on an annual basis. The Responsible Procurement Policies is available at:</p> <p>http://www.jiangsuhuafeng.com/upload/202308/24/202308241828478132.pdf</p> <p>According to the ASI documented management procedure, except for periodical review in the management review meeting, the purchasing policies will be reviewed as well as when there are any changes to the business that bring about significant changes in environmental, social and governance risks, or there are indications of control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Entity has implemented a Management System in conformance with the requirements of both ISO14001, and ISO45001 Environmental aspect, health and safety risk and control plans will be reviewed and modified annually. According to the ASI management procedures, the Entity will regularly review the environmental and social impact management plan, with a minimum review frequency of once every five years. Additionally, a reassessment of the environmental and social impact management plan is initiated when there are business changes or evidence of any control gaps leading to significant environmental, social, and governance risks. Since 2020, the Entity has not undertaken any new construction projects or made significant changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>The Entity has established and implemented documented procedures to identify and assess the risks to Human Rights and business ethics and establishes the relevant control measures based on the ASI Performance Standard and associated legal requirements. The Entity's Human Rights Impact Assessment report and management plans are available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241844202553.pdf</p> <p>The Entity's senior management will review the management plans after any changes to the Business that alter Material Human Rights risk(s) as well as if there is any indication of a control gap. Since 2020, the Entity has not undertaken any new construction projects or made significant changes to existing Facilities.</p>

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates. As part of its management processes, the Entity has developed and implemented Emergency Response Plans. The audit verifies the training of emergency response personnel and the execution of drills. The Emergency Response Plans have been formally registered with relevant government agencies and are publicly disclosed on the Entity's official website. The plans are available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241843285786.pdf http://www.jiangsuhuafeng.com/upload/202308/24/202308241842516924.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a procedure of the 'Provisions on decision-making and administration of critical business matters' to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Entity complies with Applicable Laws, follow internal policies on layoffs and also consults employee organisations. The suspension process and management procedure will 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 annually. No suspended activities have occurred in the last three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure for Mergers and Acquisitions (Investment and Construction Projects Management Procedure). Senior management will conduct Due Diligence processes for Mergers and Acquisitions when they occur, and review its environmental, social and governance practices related to ASI Performance Standard, including those associated with Historic Aluminium Operations. No such activities have occurred at the Entity in the last three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for Closure, Decommissioning and Divestment (Provisions on decision-making and administration of critical business matters). Senior management commits to review environmental, social and governance practices for the planning process for closure, decommissioning and divestment if have in future, and develop a plan for monitoring Material environmental, social and governance impacts. No such activities have occurred at the Entity in the last three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has implemented a Materiality screening process, and the key concerns of Stakeholders are identified, such as air pollution and Hazardous Waste management. The management approach and performance information of Material issues are disclosed in the annual Sustainability Report and Social Responsibility Report which are available: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and nonmonetary sanctions for the failure to comply with Applicable Law in its Annual Sustainability Report. The Entity is a subsidiary of the listed company Wanshun New Materials, and all violations are disclosed by the Entity's Head Office on the

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		<p>website, as required by the Securities Regulatory Commission. The Entity was subject to administrative penalties twice in 2021 due to environmental issues (Xu Huan Penalty No. [2021] 159 and Xu Huan Penalty No. [2021] 161) and disclosed on the website at: http://www.cninfo.com.cn/new/disclosure/detail?plate=szse&orgId=9900010150&stockCode=300057&announcementId=1216369345&announcementTime=2023-04-11</p> <p>Both environmental issues have been resolved.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity only makes or has made on its behalf, payments to Governments on a legal and/or contractual basis. Payments to Governments are reported in the Entity's annual Sustainability Report at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established a complaints/grievance receiving and handling mechanism. A complaint resolution process is specified in the management procedure, which is available for both internal and external Stakeholders, and is available at: http://www.jiangsuhuafeng.com/contact.aspx?page=contact http://www.jiangsuhuafeng.com/upload/202308/24/202308241837177725.pdf</p> <p>No significant complaint has yet been received by the Entity. Complaints, grievances and Stakeholders' concerns and resolution approaches are reviewed in the ASI management review meeting which is held annually. The Entity will review the resolution of the complaints after any changes to the Business that alter Material environmental, social and governance risks, as well as if there is any indication of a control gap occurred.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity compiles the Environmental Life Cycle Assessment (LCA) report in its format and covers all products and production lines. The LCA covers the resource including material consumption, pollutant discharge, and waste discharge. However, it was identified that some data and information on resource consumption is absent from the Assessment.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's LCA report provides cradle-to-gate information on its Aluminium products. The assessment report covers all production processes and production lines. The Environmental Life Cycle Assessment report is published on its official website for external Stakeholders. The LCA report is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241841014523.pdf</p>
4.2 Product Design	Conformance	<p>The Entity has established a Performance Monitor management procedure, however there is no direct product design and development activity undertaken by the Entity. However, the Entity makes efforts to improve the production processes to reduce resource consumption and waste generation. For instance, one of the</p>

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		quality objectives is the yield rate of each process to achieve the goal of reducing the cost.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects, recycles, and re-uses all process scrap and non-conforming products. The target for process scrap is defined as 100% recycled. The recycling records of the process scrap and non-conforming products demonstrate that the target has been achieved. As confirmed by a site observation, the Entity separates Aluminium alloys and grades for recycling.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established a Management Manual and implemented a recycling strategy, including specific timelines, activities and targets. The use rate of Recycled Aluminium is 5% for 2025 and 10% for 2030. The process scrap are 100% recycled, and Entity works with other companies within the Group to improve the recycling rate of its products. The strategy is included in the Sustainability Report: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established recycling targets for their products, which includes a use rate of recycled aluminium of 5% for 2025 and 10% for 2030. Because there are no complete local, regional, or national collection and recycling systems for Aluminium Scrap in China, the Entity works with the 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 Entity has established a management procedure for Greenhouse Gases (GHG) emissions calculation and compiles the GHG emissions reports in 2022, the GHG emission in Scope 1, and 2 and the major emissions in Scope 3 are calculated according to the calculation protocol chosen. A third party verifies the GHG emissions calculation report and issues a verification certificate. The Entity publicly discloses the GHG emissions calculation report, verification report and certificate at: http://www.jiangsuhuafeng.com/upload/202309/07/202309071246298649.pdf http://www.jiangsuhuafeng.com/upload/202309/08/202309080935280460.pdf http://www.jiangsuhuafeng.com/honor.aspx?category_id=22
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	Conformance	The Entity has established GHG emissions reduction targets and commits to reducing GHG emissions consistent with a 1.5°C warming scenario. The GHG emission reduction plan and pathway is

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		<p>established and publicly disclosed on its official website at: http://www.jiangsuhuafeng.com/upload/202309/07/202309071247214514.pdf</p> <p>There is a mechanism in place to review the GHG Emissions Reduction Plan annually and review the emissions reduction pathway as required.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established an energy management procedure. To implement the GHG Emissions Reduction Plans, the Entity has invested in technical renovation projects for the main production lines and undertakes daily energy control measures to improve energy efficiency and reduce energy consumption to achieve the GHG emissions reduction targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity adheres to the Environment Management System and legal requirements by identifying, assessing, and quantifying Material Emissions to Air caused by its activities. It also implements control plans to minimise exposure to, and impacts from, Emissions to Air. Periodic monitoring of the effectiveness of the control plans is carried out, and the control plans are reviewed regularly. In case of major changes or non-conformance identified, the Entity will implement an appropriate response(s). The Entity publicly discloses its environment performance and implementation plan, which is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241842094770.pdf</p>
6.2a-g Discharges to Water	Conformance	No wastewater is generated from the production processes. Sanitary wastewater is discharged into public drainage after filtering. The Entity monitors the quality of discharge sanitary wastewaters annually and monitoring results for 2022 and 2023 confirm that they meet legal requirements.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>An assessment of areas where Spills and Leakage may contaminate air, water and soil is conducted by following the risk assessment process of the Environmental Management System. The relevant management plan is established and implemented. The Entity reviews the plans periodically and after a Spill/Leakage event or major business change. The latest version of the report of risk identification and assessment, the management plan is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241835203477.pdf http://www.jiangsuhuafeng.com/upload/202308/24/202308241842516924.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has defined the process of reporting Spills/Leakages including to all Affected Populations and Organisations in the Emergency Response Plan. No Spills or Leakages have occurred at the Entity within the past three years. The Entity publicly discloses the environmental performance including Spills/Leakage accidents at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241842094770.pdf</p>

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6.5a-c Waste Management and Reporting	Conformance	Waste management is addressed by the Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The disposal of Hazardous Waste complies with the applicable legal requirements. The Entity publicly discloses the quantity and disposal of Hazardous and Non-Hazardous Waste generated by the Entity from its activities in 2022 at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241838160505.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	Conformance	Dross is categorised as Hazardous Waste in China, and the Entity adheres to applicable legal requirements to collect, label and store Dross. No Leakage has been observed or reported. The Entity transfers all Dross generated to the disposal suppliers which are licensed by the environment protection authorities and reports the transfer information to the authorities. The Entity reviews the disposal processes at suppliers' sites. The Entity does not landfill Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	AS described in the approved Environmental Impact Assessment report, no wastewater is generated from the production process, only sanitary wastewater is discharged into the public drainage system. In the Entity's Assessment Report of Water-Related Risks, water withdrawal and use are identified and documented by source and type. the water-related risk is assessed as low. The Assessment Report of Water-Related Risks is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241834381799.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 existing management measures are included in the Water-related risks assessment report which is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241834381799.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Biodiversity and Ecosystem Services Risk and Impact Assessment is included in the Environmental Impact Assessment (EIA) which was undertaken by qualified third parties, and the EIA reports are approved by the local Environment Protection Agency. According to approved EIA reports, there are no biodiversity-sensitive areas in the Entity's Area of Influence. The Entity is located in an industrial zone planned by the local government, and as a result, the risk is low.
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are assessed as low per the Environmental Impact Assessment report

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and Impact Assessment - Priority		approved by the local environment protection agency. No Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are assessed as low.
8.4 Alien Species	Conformance	The Entity identifies the risks of the introduction of Alien Species in its operation and logistic activities and assesses if the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The result is risk is low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has established a Management Manual that includes a commitment 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	There are no Protected Area in the Member'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	The Entity has formulated a Business Code of Conduct, affirming its commitment to uphold Human Rights, promote gender equality, and adhere to the UN Guiding Principles on Business and Human Rights. The Entity has published a Human Rights Impact Assessment Report which includes details on the approach taken to engage with affected communities and the mechanisms for resolving complaints. Based on the annual Human Rights Impact Assessment Report, records from management review meetings, and Stakeholder grievance records, the Entity's operations have not resulted in or contributed to any significant adverse Human Rights impacts. Nevertheless, should any negative impact on Human Rights be identified or reported, the Entity will provide appropriate remedies or cooperate through legitimate processes. The Code of Conduct is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241825309015.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established and implemented a comprehensive management procedure to protect female employees, demonstrating its commitment to uphold and promote gender equity and women's empowerment throughout the Entity's Group Company. The Entity has publicly disclosed information on its Gender Equity Policy and performance in safeguarding the rights of Women Workers. These disclosures are included in the Human Rights Impact Assessment Report, which is available at:

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		<p>http://www.jiangsuhuafeng.com/upload/202309/07/202309071251029276.pdf</p> <p>The Annual Sustainability Report is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf</p> <p>No complaints related to gender equity have been received in the past three years.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples where the Entity operates. However, the Entity has established and implemented policies and processes to ensure respect for 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 where the Entity operates. However, the Entity has developed a Stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for all New Projects and significant modifications to existing projects. Within this process, the Entity is dedicated to engaging in meaningful consultation and cooperation with the Indigenous Peoples involved, respecting their representative institutions, and seeking their Free, Prior, and Informed Consent.
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 where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify and assess the cultural and sacred heritage sites, aiming to minimise any potential impact on these sites. Currently, all new and existing projects of the Entity have undergone Environmental Impact Assessments (EIA) and social assessments. Through these assessments, it has been determined that there are no sacred or cultural heritage sites within the Area of Influence of the Entity.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the Entity's Area of Influence, and as confirmed by the Entity's environment and social assessment report, there are no sacred, cultural or heritage sites in the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has established New Project investment development management procedures, all project developments must be approved by the local authority. All existing completed projects are located in an industrial zone, no resettlement is required as no New Projects has been developed since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a stakeholder engagement process to actively identify and address the primary concerns of any Affected Populations and Organisations. To effectively respond to these concerns, the Entity has developed a range of plans. These plans are regularly reviewed on an annual basis, and any necessary

CRITERION	RATING	COMMENT
		<p>improvements are identified and implemented. The Entity's performance in executing these plans and actions is transparently disclosed in its annual sustainability report, available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established and implemented comprehensive Management Systems, which incorporates a Supply Chain Policy, clearly defined responsibilities and allocated resources, information gathering mechanisms, and active engagement with suppliers. The Entity's commitment to responsible sourcing is publicly disclosed in the ASI Code of Conduct and the annual Sustainability Report. The Purchasing Policy and the grievance channel are outlined in these documents, available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241828478132.pdf and the Annual Sustainability Report: http://www.jiangsuhuafeng.com/upload/202308/24/202308241828478132.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	<p>The Entity conducts regular risk assessments to identify and evaluate potential risks within its supply chain. It is important to note that the Entity does not use conflict minerals and ensures that no materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs). Furthermore, the Entity is committed to addressing critical Human Rights issues, such as Child Labour and Forced Labour, and ensures that these issues and risks are not present within its supply chain.</p> <p>However, it was identified the Entity did not conduct the audit of Due Diligence practices for a new supplier in 2023.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity has established a conflict minerals and supply chain management program with actions such as suspending cooperation, returning goods, and imposing penalties to eliminate the risk of using conflict minerals within its supply chain.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has developed and implemented a comprehensive supply chain Code of Conduct, which includes provisions related to social responsibility. As part of its commitment to responsible sourcing, the Entity conducts regular audits of its supply chain to assess compliance with the Code of Conduct and determine if conflict minerals are used in products or production processes. The risk assessment records, and supplier audit reports confirm no critical issues have been identified, and there is no evidence of conflict minerals being used in the supply chain. The risk associated with conflict minerals is assessed as low. Nevertheless, the Entity maintains a continuous improvement plan to further enhance its practices and ensure ongoing adherence to responsible sourcing principles.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	<p>The Entity has implemented the ASI Code of Conduct throughout its supply chain. It has conducted risk assessments and social responsibility audits to ensure compliance.</p> <p>However, it was identified that the relevant information and performance practice on supply chain Due Diligence, especially on conflict materials are not publicly disclosed.</p>

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	All security guards are employed by the Jiangsu Hongdun Security Services Co., Ltd. Strict policies are in place to ensure that no body searches are permitted, and security guards are expected to undertake their duties in a humane manner. Comprehensive training is provided to all security guards to ensure they understand their responsibilities and the importance of respecting Human Rights. It is worth noting that no grievances or complaints have been received regarding the conduct of security activities thus far, indicating a positive track record in this regard.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity. According to the "Trade Union Law of the People's Republic of China (2021)", the All-China Federation of Trade Unions is the only legal organisation for trade unions. The All-China Federation of Trade Unions and its constituent trade union organisations represent the interests of Workers and lawfully safeguard their legitimate rights and interests.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity's senior management commits to respect the right of Freedom of Association and Collective Bargaining. The Entity respects the rights of employees to freely associate, join or not join Trade Unions, seek representation, and join employee committees in accordance with the law. No Trade Union is organised within the Entity. There are four Worker representatives in the factory and are freely elected by Workers. There is no Collective Bargaining agreement in the Entity.
10.2a Child Labour	Conformance	In accordance with Chinese law, Child Labour is strictly prohibited, and the legal minimum working age is 16 years old. The Entity has established and implemented policies that explicitly prohibit the use of Child Labour and ensure the protection of young Workers. At present, there are no individuals classified as Child Labour or young Workers have been hired. This commitment to upholding the Rights and well-being of children is a fundamental aspect of the Entity's operations.
10.3a-c Forced Labour	Conformance	The Entity has established a comprehensive Policy that prohibits Forced Labour, including Human Trafficking. This Policy applies not only to the Entity itself but also to its suppliers, emphasising the importance of compliance with the prohibition of Forced Labour, slavery, and Human Trafficking. It is worth noting that no instances of illegal wage deduction, Debt Bondage, or any other form of Forced Labour have been identified or reported within the Entity. This underscores the Entity's commitment to ensuring fair and ethical labour practices throughout its operations. Detailed information regarding the Policy and its implementation can be found in the Entity's Code of Conduct and Responsible Procurement Policy. These documents are publicly available at: Code of Conduct: http://www.jiangsuhuafeng.com/upload/202308/24/202308241833549012.pdf Responsible Procurement Policy: http://www.jiangsuhuafeng.com/upload/202308/24/202308241828478132.pdf

CRITERION	RATING	COMMENT
		The Entity has publicly disclosed its annual Modern Slavery Statement detailing their actions to address Modern Slavery, available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241847119183.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is fully committed to promoting non-Discrimination in all aspects of its operations. It is noteworthy that no cases of Discrimination have been reported within the Entity. This commitment is reflected in the recruitment process, where advertisements and training plans emphasise that decisions are solely based on the candidate's ability to meet the job requirements, without consideration of personal characteristics or any form of Discrimination. Furthermore, feedback from interviewed Workers confirms that they feel equal and treated fairly within the Entity. This positive feedback underscores the Entity's dedication to fostering an inclusive and non-discriminatory work environment.
10.5 Communication and engagement	Conformance	Regular and open lines of communication are established between management, Workers, and worker representatives. The communication channels are effectively communicated to the workforce, enabling them to freely voice their concerns and grievances regarding working conditions, as well as seek resolution for workplace and compensation matters, without fear of retaliation, coercion, or mistreatment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies explicitly prohibiting any form of Harassment or bullying. Worker's representatives have been actively engaged in the formulation of relevant policies. To ensure widespread awareness, an informative brochure has been prepared and distributed to all employees. The Entity's Code of Conduct unequivocally addresses this matter, and regular training sessions are conducted to reinforce these principles among employees. The Code of Conduct is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241822041148.pdf
10.7a-c Remuneration	Conformance	All employees enter into labour contracts with the Entity within the first month of their employment. These labour contracts clearly outline the terms of employment and the respective rights and obligations of both parties. Each employee is provided with an original copy of their labour contract. The wage structure is unambiguously outlined, with the basic wage exceeding the local legal minimum requirement. Overtime compensation fully follows legal obligations. Mandatory allowances are provided to all Workers, ensuring their essential needs are met. Additionally, all employees are enrolled in the obligatory social insurance program. The payment of wages is documented and promptly disbursed to all Workers via bank transfer on the 15 th day of the next month.
10.8a-c Working Time	Minor Non-Conformance	Most production workshops at the Entity implement a two-shift rotation system with three teams, with a day shift and a night. Some teams follow a three-shift rotation system. Office staff work five days a week, totalling 40 hours per week. Working hours are recorded and monitored, most Workers' monthly Overtime working hours do not exceed the legal monthly limit, and all Workers have one day off per week.

CRITERION	RATING	COMMENT
		However, it was identified that in two sampled months, some Workers had worked Overtime for more than the legal limit of 36 hours per month. Additionally, in one sampled month, some Workers did not receive a weekly day off. And the information on the working hour system in employment contracts for new Workers was incorrect.
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 at all its production plants via several channels including the Employee Handbook, intranet and notice boards.
II. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented, maintains and continually improves the Occupational Health and Safety Management System, and holds a valid ISO 45001:2018 certificate. Site observations and document review and both management and Worker interviews confirmed that the OH&S management system is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity periodically reviews the OH&S Management System through annual legal compliance evaluation, an annual internal audit against ISO 45001:2018, and regular management review meetings. When any indication of a control gap is identified, the review is conducted to assess if the potential corrective and/or preventive actions should be implemented. The Entity's OH&S performance is publicly disclosed in the Sustainability Report in 2022, available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241839370514.pdf</p> <p>However, it was identified that the Entity did not conduct a comparative analysis of performance with peer Businesses or leading practices and did not identify or publicly disclose leading and lagging indicators.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in Health and Safety in compliance with the ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&S issues to management representatives. The Entity's management then responds to the concerns and advice on OH&S issues from Workers.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 October 2023	Initial Certification Audit – Full Certification
