

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Anhui Zhongji Battery Foil Science & Technology Co., Ltd.

CERTIFICATE NUMBER
104

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
11 DECEMBER 2023

DATE OF EXPIRY
10 DECEMBER 2026

CERTIFIED SINCE
11 DECEMBER 2020

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Anhui Zhongji Battery Foil Science &
Technology Co., Ltd. is located at 88
Yinghua West Road, Suixi Economic
Development Zone, Anhui Province,
China.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Zhongji Battery Foil Science & Technology Co., Ltd.
CERTIFICATION SCOPE	Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (9 – 10 October 2020)Surveillance Audit (16 – 17 August 2022)Re-Certification Audit and Scope Change (23 – 24 October 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">9 – 10 October 2020 (Initial Certification Audit)16 – 17 August 2022 (Surveillance Audit)23 – 24 October 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">9 November 2020 (Initial Certification Audit)9 September 2022 (Surveillance Audit)27 November 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 10 October 2020)</u></p> <p>Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and main production processes include remelting and casting, cold rolling, and finishing.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">CasthousesMaterial Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (16 – 17 August 2022)</u></p> <p>Anhui Zhongji Battery Foil Science & Technology Co., Ltd. is located at 88 Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and the main production processes include remelting and casting, cold rolling, and finishing.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Casthouses

-
- 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 (23 - 24 October 2023)

The audit scope covered Anhui Zhongji Battery Foil Science & Technology Co., Ltd., which (following a divestment of remelting and casting operations in 2023) focuses solely on the manufacture of Aluminium foil.

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

11 December 2023 - 10 December 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

10 December 2025

CERTIFICATE NUMBER

104



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

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

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

ENTITY OVERVIEW

Anhui Zhongji Battery Foil Science & Technology Co., Ltd. was founded in 2011 and wholly acquired by Jiangsu Zhongji Composite Material Co., Ltd. under the Wanshun New Material Group (Stock Code: 300057) in 2017. In August 2018, a battery foil expansion project with an annual output of 72,000 tonnes was launched to build a factory for positive foil and Aluminium foil for Aluminium plastic film.

The Entity's main suppliers mainly include Hangzhou Wuxing, Huabei Aluminum, Hangzhou Yongjie, Jiangsu Changlv, Luoyang Youbo. The Entity is located within the Suixi Economic Development Zone in the Anhui Province, which houses numerous Aluminium processing companies.

There are approximately 400 employees at the Entity.

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 management process for the identification and assessment of ASI-related legal requirements and other requirements is established, implemented, and maintained. Legal and other requirements are identified and integrated into the operation management. Compliance with Applicable Law and other requirements is evaluated annually.
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented a Policy and procedures to manage anti-Corruption. The Entity has developed and implemented whistleblowing mechanisms (e.g., a suggestion box, hotline: 0561-7976888, mailbox: 273308686@qq.com). The whistleblowing channel is published for employees and interested parties.</p> <p>The relevant anti-Corruption training courses are provided to employees in high-risk positions. The Anti-Corruption Policy is communicated to all suppliers, and suppliers sign the related commitment letter.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented measures, including training and communication to raise awareness on the Code amongst business partners and suppliers.</p> <p>The Code of Conduct is reviewed in the annual management review meeting, or when there is a major change or control gap. The Code of Conduct is disclosed at: http://cn.ahzjalufoil.com/upload/20231020113903.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented management Policies that are consistent with ESG practices. The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies are reviewed at the annual management review meeting and when there is a major change or control gap. The Entity's Policies are available for internal and external Stakeholders at: http://cn.ahzjalufoil.com/upload/20231020114528.pdf</p>
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative to have overall responsibility and authority for ensuring conformance with the ASI Performance Standard, including leading the communication of the ASI Performance Standard-related requirements via training on Policies and on-site displays.
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 certification. The latest audit was conducted in July 2023 and no major non-conformances were raised.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. The main social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that address responsible sourcing. The Entity conducts second party Due Diligence audits of 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 reviewed in the annual management review meeting and when there is a major change or control gap. The Responsible Purchasing Policy is available at: http://cn.ahzjalufoil.com/upload/20231020114123.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has a New Project currently in development for a 32,000 tonne expansion. The Entity has assessed the environmental and social impacts following the legal requirements, and implements an environmental and social impact management plan to prevent and mitigate any Material impacts identified. The Entity has a mechanism to periodically review the environmental and social impact management plan or as necessary. The Environmental and Social Impact Assessment, and the latest active version of the environmental and social impact management plan are publicly disclosed at: http://cn.ahzjalufoil.com/upload/20231020114246.pdf http://cn.ahzjalufoil.com/upload/20231023093039.pdf and http://cn.ahzjalufoil.com/upload/20231020114452.pdf
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has a New Project currently in development for a 32,000 tonne expansion. The Entity has identified and assessed the risks on Human Rights and established relevant control measures based on the ASI Performance Standard and associated legal requirements. The Human Rights Impact Assessment determined that the risk and impact on Human Rights is limited due to the scale and nature of the expansion project. There are no Indigenous Peoples in the Entity's Area of Influence. The Report is reviewed in the annual management review meeting and disclosed at: http://cn.ahzjalufoil.com/upload/20231020114452.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has established a Comprehensive Emergency Response Plan and a Special Emergency Plan. Both plans are registered with the relevant government agencies. The Entity has provided relevant training to employees and conducts emergency drills. The Emergency Response Plans are reviewed every three years and when there is a major change or control gap, and re-submitted to the authorities for registration. The Emergency Response Plans are disclosed at: http://cn.ahzjalufoil.com/upload/20231020114740.pdf and http://cn.ahzjalufoil.com/upload/20231020114549.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a plan for business continuity and resumption, which takes into account Material adverse environmental, social and governance impacts. The Entity has established the ASI PS

CRITERION	RATING	COMMENT
		Management Manual, which requires the review of the Plan in the annual management meeting and when there are major changes to the Business or a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions, however, no such activity has occurred since its establishment in 2011.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment, and no such case has occurred since its establishment in 2011.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts in its Sustainability Report 2022: http://cn.ahzjalufoil.com/upload/20231020114433.pdf
3.2 Non-compliance and Liabilities	Conformance	There were no Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law during 2022. This was confirmed during management interviews and the official websites of relevant government agencies and Non-Government Organisations (NGOs). This information is disclosed in the Sustainability Report 2022, Section 5: http://cn.ahzjalufoil.com/upload/20231020114433.pdf
3.3a-c Payments to Governments	Conformance	The Entity has implemented an internal control procedure that ensures payments to governments are only made on a legal basis. There are no payments to political parties. Payments to governments include taxes only. The Entity is a subsidiary of Shantou Wanshun New Material Group Holding Co., Ltd. which is a listed company, and in accordance with security regulations, discloses its financial reporting. The 2023 Semi-Annual Report is disclosed at: http://www.cninfo.com.cn/new/disclosure/detail?plate=szse&orgId=9900010150&stockCode=300057&announcementId=1217707836&announcementTime=2023-08-31
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Complaints Resolution Policy. Whistleblowing is encouraged and the privacy of the whistleblower is guaranteed. The email address for internal and external Stakeholders to make complaints and grievances is published in the Responsible Purchasing Policy and in the Sustainability Report 2022, Section 6: http://cn.ahzjalufoil.com/upload/20231020114123.pdf http://cn.ahzjalufoil.com/upload/20231020114433.pdf The Complaints Resolution Mechanism is disclosed at: http://cn.ahzjalufoil.com/upload/20231020114123.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has assessed the environmental impacts of its main Product line, Aluminium foil, using its own established methods. The environmental Life Cycle Assessment (LCA) follows a cradle-to-gate approach and includes the disposal process of production waste. The Entity has publicly disclosed its LCA report, available at:

CRITERION	RATING	COMMENT
		http://cn.ahzjalufoil.com/upload/20231110135041.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity's LCA provides information on the Entity's Aluminium foil Products from cradle to gate. The Entity commits to providing further data and information regarding the lifecycle of its Products upon request from customers. The LCA report includes basic LCA information and assumptions. The evaluation report can be accessed through the Entity's official website at:</p> <p>http://cn.ahzjalufoil.com/upload/20231110135041.pdf</p> <p>However, there is incomplete disclosure of information in the Entity's LCA report, in particular the evaluation results.</p>
4.2 Product Design	Conformance	<p>The Entity itself does not engage in any Product design activities. However, the Entity incorporates relevant sustainability goals into its production process control and raw material procurement processes to enhance the sustainability of its Products, including the environmental life cycle impact of the final Products.</p>
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	<p>The Entity has established regulations for Aluminium scrap recycling, and has a target of 100% collection and recycling of Process Scrap. The Entity has implemented various technical and management measures to reduce the generation of Aluminium Process Scrap in its operations and ensure achievement of the 100% recycling target.</p> <p>On-site observations revealed that most of the Process Scrap was properly classified and collected according to series 1 (battery foil) and series 8 (double zero foil). However, some Aluminium Scrap in the warehouse was without proper sorting or classification.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has established an Aluminium recycling utilisation strategy with targets to achieve 5% and 10% recycled Aluminium content in its Products by 2024 and 2030, respectively. The Entity has publicly disclosed its strategy on its website. Additionally, it has formed a cross-departmental taskforce that focuses on technology, quality, and procurement to drive the implementation of its strategy. The Entity is committed to regularly evaluating the progress of the strategy and achievement of the established targets. The Aluminium recycling utilisation strategy is included in the Sustainability Report, available at http://cn.ahzjalufoil.com/upload/20231020114433.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has achieved agreements or framework agreements with its upstream and downstream suppliers as well as customers for the use of recycled Aluminium in its Products. It is anticipated that by 2024, recycled Aluminium will account for 5% of its total production, with a target to reach 10% by 2030.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has commissioned a Third Party to assess the organisational-level Greenhouse Gas (GHG) emissions. The GHG Inventory Report provides detailed information on the Entity's annual material and energy consumption and GHG emissions from Scope 1, 2 and 3 emissions sources. The annual GHG emissions have been verified by a Third Party. The GHG Inventory Report and the Verification Certificate is available at:</p>

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		<p>http://cn.ahzjalufoil.com/upload/2023110135419.pdf and http://cn.ahzjalufoil.com/upload/20231020113702.pdf</p> <p>However, the Entity has incorrectly used the national emissions factor instead of the regional emissions factor for its purchased electricity source (Scope 2 Indirect Emissions).</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established GHG emissions reduction targets for 2023 and 2027 with a plan to reduce GHG emissions per unit of Product to below 0.6 t CO₂e/t.</p> <p>The Entity has implemented technological improvements to enhance energy efficiency and reduce energy consumption. Additionally, the Entity plans to procure and utilise renewable energy sources to further reduce its GHG emissions.</p> <p>The Entity has publicly disclosed its GHG emissions reduction strategy, plans, and progress on its website. The Entity commits to conducting annual GHG emissions inventories and verifying the implementation of the GHG Emissions Reduction Plans. The GHG Emissions Reduction Plan can be accessed at: http://cn.ahzjalufoil.com/upload/2023110135504.pdf</p>
5.4 GHG Emissions Management	Conformance	The Entity compiles the GHG emission reduction Plan to define the management approaches on GHG emissions, with the main focus on the energy management. Based on site observations, a document review and interviews, following the Plan-Do-Check-Action approach, the Entity manage the energy consumption and monitors the Management System performance to achieve the GHG emission reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has recently discontinued the casting process, and the main air pollutants originate from the emission of volatile organic compounds (VOCs) and nitrogen oxides (NO_x). The Entity has formulated an Air Pollutant Reduction Plan and implemented an Air Emissions Management Procedure, which includes regular maintenance of air pollution control facilities and periodic monitoring of exhaust gas emissions.</p> <p>The Entity has a process to review and revise the management plan whenever any significant risks related to atmospheric pollutants occur, in addition to conducting regular reviews of the reduction plan. Annual monitoring reports are prepared to demonstrate compliance with regulatory requirements. The Entity's Air Pollutant Reduction Plan and annual pollutant emissions are publicly disclosed at: http://cn.ahzjalufoil.com/upload/2023110135754.pdf and</p>

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		http://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=8dea6787638a468394e51abd97a7bb4b
6.2a-g Discharges to Water	Conformance	<p>The Entity has recently discontinued its casting process and only engages in the Aluminium foil rolling process, which does not generate process wastewater during production. Based on the assessment conducted on water resources and annual monitoring of domestic wastewater discharge, the Entity's consumption of domestic water has an extremely low impact on water resources and the environment. As a result, the Entity does not currently have a water pollutant reduction plan in place.</p> <p>The Water Resources Assessment Report and Water Balance Map of the Entity can be accessed at: http://cn.ahzjalufoil.com/upload/20231020114720.pdf and http://cn.ahzjalufoil.com/upload/20231020114700.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established and implemented an ISO 14001 certified Environmental Management System (EMS). According to the approved Environmental Impact Assessment report and in compliance with the requirements of the EMS, the Entity has identified and developed corresponding emergency measures and plans to address Spills and Leakages.</p> <p>The Environmental Emergency Plan has been filed with the local environmental protection agency, and the risk identification and emergency plan have been publicly disclosed at: http://cn.ahzjalufoil.com/upload/20231020114815.pdf and http://cn.ahzjalufoil.com/upload/20231020114740.pdf</p> <p>The Entity has made a commitment to review and revise the relevant emergency response and Spill/Leakage prevention management plans in the event of any significant changes in the risks associated with Spills and Leakages, as well as upon indication of any control deficiencies identified.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The reporting of Spills and Leakages 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 at: http://cn.ahzjalufoil.com/upload/20231020114815.pdf and http://cn.ahzjalufoil.com/upload/20231020114740.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. Waste management is addressed in the Entity's EMS. An inventory of Waste generated in the operations is established and the control methods for the different types of Waste are defined. The main Hazardous Wastes are diatomite with oil and waste oil including rolling oil and mineral oil. Hazardous Wastes are transferred to qualified suppliers for disposal, which complies with legal requirements. Each transfer is registered on the website of the Environment Protection Ministry and transfers are audited.</p> <p>The Entity has publicly disclosed information on Waste generation and disposal in the 2022 Waste Management Report: http://cn.ahzjalufoil.com/upload/20231020114041.pdf</p>

CRITERION	RATING	COMMENT
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	<p>The Entity has determined and documented its water intake and usage based on source and type in its environmental impact and water resource risk assessment. The Entity has assessed the risks associated with water, taking into consideration the surrounding water environment, water intake and discharge, as well as the effectiveness of existing management measures. The Entity's water resource risk is considered low, and there are no significant water-related risks within the Entity's Area of Influence.</p> <p>The Entity has prepared a risk assessment report and a water balance diagram related to water, which are publicly available at: http://cn.ahzjalufoil.com/upload/20231020114720.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water resource risk is considered low, and there are no significant water-related risks within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has developed a Biodiversity assessment, as part of the Environmental Management System. The risk or impacts on Biodiversity was assessed as low. The assessment involved Third Parties and the report was approved by the local Environmental Protection Bureau (EPB). Further information on the Biodiversity Risk Assessment Report is available: http://cn.ahzjalufoil.com/upload/20231024152642.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services were assessed and documented as low. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has established a management Policy and Procedures to prevent the introduction of Alien Species. It has identified the risks associated with the introduction of invasive species in both its operations and logistics activities in its Biodiversity assessment, which determined the Entity's activities posed a low risk of introducing Alien Species.

CRITERION	RATING	COMMENT
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	The Entity has committed to protecting the environment in its management manual. There are no Protected Areas within the Entity’s Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Policy with the commitment to respect Human Rights including gender equity, and has communicated the Policy to all employees. The Entity has established and implemented a Human Rights Due Diligence process and mapped the Affected Populations and Organisations.</p> <p>Human Rights risks are identified and assessed, and the major risks identified are in the Entity’s supply chain. The Entity’s Supplier Code of Conduct is communicated to major suppliers. The associated mitigation and control measures are established and implemented, such as audits for major suppliers. Supplier audit reports demonstrate that no adverse case was reported. There was also no negative news identified on-line regarding Human Rights issues related to the Entity and its major suppliers.</p> <p>The Entity’s Human Rights Due Diligence process is reviewed in the annual management review meeting.</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Entity has implemented Policies to respect for the rights of women and a program to promote gender equity and women’s empowerment in the whole employment process. No complaints have been received from Workers. Women Workers interviewed confirmed they know their rights and no negative feedback was received. The Entity has assessed its program on gender equity and women’s empowerment and disclosed the report at:</p> <p>http://cn.ahzjalufoil.com/upload/20231020114223.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity’s Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity’s Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify sacred or cultural heritage sites and values within their Area of Influence and take appropriate action to avoid or remedy impacts, as well as to ensure continued rights of access to such sites or values. There are no cultural and sacred 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 to the Entity, as there are no sacred or cultural heritage sites or values in the Entity's Area of Influence and no Indigenous Peoples or their lands, territories and resources.
9.6a-i Displacement	Conformance	The Entity has established a Policy to address resettlement in the frame of legal requirements. In China, resettlement is managed by the government. There have been projects that required resettlement in the history of the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Policy to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity is located in an industrial zone with no nearby communities. The Entity employs local people to support livelihoods.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has implemented a Policy with commit to not using conflict minerals and has implemented a Management System, which addresses supply chain mapping, risk assessment, control plan, Due Diligence audits and reporting.</p> <p>The Entity provides training for all relevant employees and the Policy and its requirements are communicated to suppliers. Suppliers sign a Commitment Letter to not use nor support conflict minerals.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment to determine if materials are from Conflict-Affected and High-Risk Areas (CAHRAs). Based on results of the communication with suppliers and the risk assessment report, there are no materials from CAHRAs, and no critical Human Rights issues including Child Labour or Forced Labour.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	As per the Entity's risk assessment report, there are no materials sourced from CAHRAs and no red flags identified in the supply chain. The Entity maintains the business relationship with all material suppliers. Any required response to new risks would be undertaken in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>As part of supplier Due Diligence process, the Entity identifies the major next tier suppliers, sets up the supplier audit plan, and conducts second party Due Diligence audits at major next tier suppliers' sites.</p> <p>The Entity's Due Diligence practices were audited as part of this ASI Audit.</p>

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has made a commitment to publicly disclose the performance of its supply chain Due Diligence for CAHRAs. However, the performance of supply chain Due Diligence for 2022 has not been publicly reported.
9.9 Security practice	Conformance	<p>The Entity has established a management procedure to address respect for Human Rights in its security activities. Security guards are located at the Entity's Entrance Gate for visitor management only and no body searches or restriction to Workers' movement is permitted. Security guards are provided with appropriate training.</p> <p>Worker interviews confirmed the understanding of security tasks and the means respect Human Rights. There has been no grievance or complaint made against the Entity's security activities.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China regarding Freedom of Association and the right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has demonstrated respect for the right to Freedom of Association and Collective Bargaining. Workers' representatives can manage any concerns with management on behalf of Workers. Workers are aware of the complaints process and know how to report their concerns.
10.2a Child Labour	Conformance	<p>No Child Labour was found at the Entity, as per the roster, site observations and Worker interviews, and the youngest Worker was 18 years old. In China, the minimum working age is 16.</p> <p>The Entity has established a Policy to not use or support Child Labour. The age of the candidate is verified by checking identity cards and during interview. Copies of Workers' identity cards are retained as evidence of age verification.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy on the prohibition of Forced Labour, including Human Trafficking. The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Worker and management interviews, document review and site observation confirmed that the Entity neither engages in nor supports the use of Forced Labour.</p> <p>Workers are hired directly by the Entity and Workers do not pay fees or deposits, and loans are not provided to Workers. The Entity does not retain Workers' identity documents. The freedom of movement is respected by the Entity and Workers can freely terminate their employment with prior notice.</p> <p>The Entity has disclosed a Modern Slavery Statement for 2022: http://cn.ahzjalufoil.com/upload/20231020114014.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. The Entity's recruitment process and training plan indicates that decisions are solely based on the candidate's ability to perform the job's requirements rather than personal characteristics, and there is equal pay for the same work. No case of Discrimination has been received.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and the Workers' representatives. Communication channels are provided to Workers where they can make complaints and raise concerns regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Minor Non-Conformance	The Entity has established a management procedure on the prohibition of Harassment and abuse and the Employee Handbook defines disciplinary measures. However, the workplace Policy on Violence and Harassment is not publicly disclosed.
10.7a-c Remuneration	Conformance	The Entity's wage structure is clearly defined and the basic wage is above the legal minimum wage. The total payment meets Workers' basic needs. The Entity documents wage payments and payments are made in a timely manner by bank transfer on the 15 th day of the following month. Detailed information on wages, allowance, Overtime work compensation, and deductions are included on the payslip.
10.8a-c Working Time	Minor Non-Conformance	Working hours are recorded manually. The Working Time for office staff is 40 hours a week over five days. For workshop Workers, there are three groups for two shifts and Workers work four consecutive days with 2 days' rest. However, the audit found that one Worker worked 14 consecutive days in March 2023 and the average weekly working hours of three day-shift Workers exceed 40 hours during January to June 2023.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights via orientation and through regular training and provision of the Employee Handbook to Workers.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has established, implemented and maintained an Occupational Health and Safety (OH&S) Management System that is continually improved. The Entity's OH&S Management System is ISO 45001:2018 certified. Through on-site observations, document review, and interviews with management and Workers, the effectiveness of the OH&S Management System has been confirmed. However, a Minor Non-Conformance has been raised as the annual firefighting inspection required by law has not been performed in a timely manner.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has conducted periodic reviews of its OH&S Management System through various means, including monthly safety meetings, an annual evaluation of legal compliance, annual internal audits, and management review meetings. Should any indication of a control gap arise during these reviews, a thorough assessment is conducted to determine the necessity of implementing potential corrective and/or preventive actions. The Entity has published its OH&S performance data, including its achievement of OH&S objective and targets for 2022 and provides a comparative analyses with peer businesses and leading practices. The data are available in the Entity's Sustainability Report:

CRITERION	RATING	COMMENT
		http://cn.ahzjalufoil.com/upload/20231110135017.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system for OH&S consultation and participation and encourages Workers to, independently or via their representatives, report concerns or suggestions regarding OH&S issues. Management responds to the concerns and suggestions raised by Workers. The Entity has established a Health and Safety Committee, which regularly holds communication sessions with management to discuss matters related to OH&S and determine improvement actions.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 December 2020	Initial Certification Audit – Full Certification
1	21 June 2022	Revised to reflect updated Entity Name from Anhui Maximum Aluminium Industries Co., Ltd.
2	10 October 2022	Surveillance Audit
3	31 January 2024	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply PS V3; including revised title for the Material Conversion supply chain activity. Scope Change to remove the supply chain activity of Casthouses reflects a re-organisation of the company structure.