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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**XIAMEN XIASHUN  
ALUMINIUM FOIL  
CO., LTD.**

CERTIFICATE  
NUMBER

33

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

17 JULY 2022

DATE OF EXPIRY

16 JULY 2025

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John', written over a white background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Xiashun manufactures and sells Foil Stock, Lithographic and Closure sheets and ultra-thin aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. Xiashun's Headquarters and production facilities (Sheet Plant, Haicang Foil Plant, Huli Foil Plant) are located in Fujian, China.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

|                         |   |
|-------------------------|---|
| MEMBER NAME             | Xiamen Xiashun Aluminium Foil Co., Ltd.   |
| ENTITY NAME             | Xiamen Xiashun Aluminium Foil Co., Ltd.   |
| CERTIFICATION SCOPE     | <p>Xiashun manufactures and sells Foil Stock, Lithographic and Closure sheets and ultra-thin aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. Xiashun's Headquarters and production facilities (Sheet Plant, Haicang Foil Plant, Huli Foil Plant) are located in Fujian, China.</p> |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>   |
| ASI STANDARD            | <ul style="list-style-type: none"><li>Performance Standard V2</li></ul>   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>Initial Certification Audit (24 – 26 April 2019)</li><li>Surveillance Audit (9 – 12 August 2021)</li><li>Re-Certification Audit (16 – 18 May 2022)</li><li>Surveillance Audit (22 – 23 May 2024)</li></ul>  |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.   |
| AUDIT DATE              | <ul style="list-style-type: none"><li>24 – 26 April 2019 (Initial Certification Audit)</li><li>9 – 12 August 2021 (Surveillance Audit)</li><li>16 – 18 May 2022 (Re-Certification Audit)</li><li>22 – 23 May 2024 (Surveillance Audit)</li></ul>  |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>20 May 2019 (Initial Certification Audit)</li><li>28 August 2021 (Surveillance Audit)</li><li>11 July 2022 (Re-Certification Audit)</li><li>13 June 2024 (Surveillance Audit)</li></ul>   |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (24 – 26 April 2019)</u></p> <p>Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main</p>   |

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processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing, at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

#### Surveillance Audit (9 – 12 August 2021)

The audit scope included the remelting, casting, hot rolling, cold rolling, and finishing (foilstock, litho stock (CTP), capstock) and foil rolling and finishing (light-gauge aluminium foil that is less than 10µm and lithium battery foil) at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

#### Re-Certification Audit (16 – 18 May 2022)

The audit scope covers the manufacture and sale of Foil Stock, Lithographic and Closure sheets, ultra-thin aluminum foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. The facilities include Headquarters and the production sites Sheet Plant, Haicang Foil Plant and Huli Foil Plant.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

#### Surveillance Audit (22 – 23 May 2024)

The Audit Scope covers the manufacture and sale of Foil Stock, Lithographic and Closure sheets, ultra-thin aluminum foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. The facilities include Headquarters and the production sites Sheet Plant, Haicang Foil Plant and Huli Foil Plant.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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- Semi-Fabrication

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

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AUDIT  
OUTCOME

- Certification
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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.
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CERTIFICATION  
PERIOD

17 July 2022 – 16 July 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

16 July 2025

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CERTIFICATE  
NUMBER

33

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## SUMMARY OF FINDINGS

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY   |             |   |
| 1.1 Legal Compliance   | Conformance | The Entity has developed and implemented Policies, systems, procedures and processes to conform to the requirements in the ASI Performance Standard and ensure Compliance with Applicable Law. There have been no fines or requests for corrective actions from government agencies or other Stakeholders in the past two years. The Entity conducts an annual Compliance evaluation. According to the latest evaluation, no violation was found.   |
| 1.2 Anti-Corruption  | Conformance | Policies and processes to identify and prevent Corruption are well implemented and trained. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The whistleblowing channels are available to all interested parties. Three cases were received in 2023, all were investigated and there was no confirmed case.  |
| 1.3 Code of Conduct  | Conformance | The Entity has established a Code of Conduct that addresses social and governance principles. The Policies and the associated management procedures for ISO 14001 and ISO 45001 standards address the implementation of management requirements on environment and Occupational Health and Safety. The Code of Conduct is available for all interested Stakeholders on the Entity's website:<br><a href="https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a> |
| PRINCIPLE 2 POLICY & MANAGEMENT  |             |   |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity's management Policies are consistent with the environmental, social, and governance practices, and published on the Entity's website:<br><a href="https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a>   |
| 2.1b Environmental, Social, and Governance Policy (senior management)      | Conformance | Senior management demonstrates a commitment to the implemented Policies, endorsement and support to provide sufficient resources for regular review of the Policies.  |

| CRITERION   | RATING      | COMMENT   |
|---|-------------|---|
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | <p>The Policies are available for internal and external Stakeholders through training, publishing on the website and posts on-site. For further information, please refer:</p> <p><a href="https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a></p> <p>For internal communication, the Entity uses WeChat to publish all ASI related content for all employees.</p>   |
| 2.2 Leadership  | Conformance | <p>A senior Management Representative has been nominated. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.</p>  |
| 2.3a Environmental and Social Management Systems (environmental)  | Conformance | <p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The Certification Scope is 'Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers the Haicang Foil Plant, Huli Foil Plant and Sheet Plant production facilities'. The latest ISO 14001:2015 audit was conducted in April 2024 and there were no major non-conformances issued. The Entity has analysed the root cause of minor non-conformances raised and has implemented the required corrective actions.</p>   |
| 2.3b Environmental and Social Management Systems (social)         | Conformance | <p>The Entity has implemented and documented a Social Management System and holds a valid ISO 45001:2018 certification. The latest audit was conducted in April 2024 and there were no major non-conformances raised. The Entity has analysed the root cause of minor non-conformances raised and has implemented the required corrective actions.</p>  |
| 2.4 Responsible Sourcing  | Conformance | <p>The Entity has established and communicated the Responsible Sourcing Policy to all suppliers and contractors, which covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. There is a Due Diligence process in place to manage the risks within the supply chain. The Responsible Sourcing Policy is publicly disclosed at:</p> <p><a href="https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a></p> |

| CRITERION                                   | RATING      | COMMENT  |
|---|-------------|--|
| 2.5 Impact Assessments                      | Conformance | The Environmental, Social, Cultural and Human Rights Impact Assessments are well implemented in various departments. The identified risks to the environment, social, Occupational Health and Safety and governance are assessed. The latest Impact Assessment on Human Rights, labour rights, and governance was conducted in April 2024. The control measures for the identified risks are defined and implemented. There have not been any New Projects or Major Changes since the Entity became an ASI Member. |
| 2.6 Emergency Response Plan                 | Conformance | In collaboration with potentially affected Stakeholder groups, the Emergency Response Plans on Human Rights, Labour Rights, Environment, Occupational Health and Safety are established, well implemented and trained.   |
| 2.7 Mergers and Acquisitions                | Conformance | The Entity has established a procedure for mergers and acquisitions, but there has been no such activity since the ASI Management System became operational in 2018.   |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity has established a procedure for closure, decommissioning and divestment in accordance with the requirement of the ASI Performance Standard. There has been no such case since the ASI Management System became operational in 2018.   |
| PRINCIPLE 3 TRANSPARENCY                    |             |  |
| 3.1 Sustainability Reporting                | Conformance | The annual Sustainability Report includes information on the Entity's management practices and performance on governance, environment, Human Rights, and labour rights including Occupational Health and Safety. The 2023 Sustainability Report is published on the Entity's website:<br><a href="https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddd.pdf">https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddd.pdf</a>                 |
| 3.2 Non-compliance and liabilities          | Conformance | There were no non-compliance or liabilities recorded in the 2023 Sustainability Report. According to the official websites of the relevant government agencies and non-government organizations (NGOs), there were no non-compliance or liability cases raised by the government agencies.   |
| 3.3a Payments to governments (legal         | Conformance | According to the 2023 Sustainability Report, the   |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| and contractual)  |                | payments to government made by the Entity are only those legally required; and there were no other payments.  |
| 3.3b Payments to governments (disclosure – bauxite mining)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance    | The Entity's whistleblowing/complaints/grievance channels are established and effective. The hotline (+86-18206079837) and email address ( <a href="mailto:jubao@xiashun.com">jubao@xiashun.com</a> ) are published for internal and external Stakeholders. Whistleblowing cases were received in 2023 and the effectiveness of the channel was demonstrated.   |
| PRINCIPLE 4 MATERIAL STEWARDSHIP                                    |                |   |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts)       | Conformance    | The Entity has conducted environmental Life Cycle Assessments (LCA) to include its Aluminium foil and sheet products. The LCA is cradle-to-gate and the impact of the various production stages and End of Life recycling is assessed.  |
| 4.1b Environmental Life Cycle Assessment (cradle to gate)           | Conformance    | The Entity has established a control process for providing customers with information on the Products' cradle-to-gate LCA, outlining the application, approval, provision process, and responsibilities.  |
| 4.1c Environmental Life Cycle Assessment (public communication)     | Conformance    | The Entity has publicly disclosed its LCA summary reports of two Products on its website: <a href="https://www.xiashun.com/public/attachment/images/20240523/af0fc33c5739ed95b1492c9ba58418c1.pdf">https://www.xiashun.com/public/attachment/images/20240523/af0fc33c5739ed95b1492c9ba58418c1.pdf</a> and <a href="https://www.xiashun.com/public/attachment/images/20240523/e0bd7db3ad15898af8d235a4ba477804.pdf">https://www.xiashun.com/public/attachment/images/20240523/e0bd7db3ad15898af8d235a4ba477804.pdf</a> |
| 4.2 Product design  | Conformance    | The Entity has considered sustainability indicators such as energy consumption and Process Scrap generation during the Product design and development process, and has incorporated the proportion of Recycled Aluminium into the design objectives.  |
| 4.3a Aluminium Process Scrap (targets)                              | Conformance    | The Entity has established the management process for Aluminium Process Scrap. The Process Scrap generated in the manufacturing processes for sheets and foils are all collected, packed, re-melted or sold to third parties for recycling or processing. The Process Scrap   |



| CRITERION   | RATING                | COMMENT  |
|---|-----------------------|--|
|   |                       | utilisation rate is 100%.  |
| 4.3b Aluminium Process Scrap (alloy separation)                       | Conformance           | The Entity's Products are primarily categorized into two main types based on varying alloy compositions and different applications. The Entity has implemented procedures for the collection of Process Scrap. The scrap collection log confirms that the Entity is actively engaged in the classification and recycling of Process Scrap.   |
| 4.4a Collection and recycling of products at end-of-life (strategy)   | Conformance           | The Entity has instituted a strategy and objectives for the use of Recycled Aluminium. Taking into account the particular quality requirements of its Products, the proportion of Recycled Aluminium in the Entity's Products cannot be excessively high. Therefore, the Entity plans to increase the content of Recycled Aluminium in its final Products from 2.5% to 7.5% between 2023 and 2025.   |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance           | There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity is working with the customer to decide how to improve the recycling rate of Products at End of Life.   |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS                                  |                       |  |
| 5.1 Disclosure of GHG emissions and energy use                        | Minor Non-Conformance | Energy consumption and the major relevant Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions are tracked and documented. The energy consumption and other major GHG sources are converted into GHG emissions using the GHG protocol defined by ISO14064-1:2018. The 2023 GHG emissions summary report and energy consumption data are publicly disclosed: <a href="https://www.xiashun.com/public/attachment/images/20240328/a89006f2c0fc6e5f61bb04e11f448f2f.pdf">https://www.xiashun.com/public/attachment/images/20240328/a89006f2c0fc6e5f61bb04e11f448f2f.pdf</a><br>However, a Minor Non-Conformance is identified for the incorrect emission factors applied in the emissions calculation. |
| 5.2 GHG emissions reductions  | Conformance           | The Entity has developed a medium to long-term GHG emissions reduction plan for 2025 and 2030. The Entity aims to reduce its total GHG emissions by 10% compared to the baseline year of 2021 by 2025, and by 28% by 2030. The emissions reduction plan primarily focuses on enhancing energy efficiency, reducing process waste generation, utilising renewable energy, and procuring low-carbon Aluminium. The Entity's GHG emission reduction plan and performance  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | are available in the 2023 Sustainability Report, page 7:<br><a href="https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf">https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf</a>  |
| 5.3a Aluminium Smelting (management system)                       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 5.3b Aluminium Smelting (up to and including 2020)                | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 5.3c Aluminium Smelting (after 2020)                              | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE                        |                |  |
| 6.1 Emissions to Air  | Conformance    | The waste air generated in the operation is collected and treated before discharge. The Entity has developed and implemented an Air Emissions Management Plan with actions and controls to mitigate adverse impacts.<br>The Entity publicly discloses air emissions information annually in the Environmental Information Disclosure Reports, refer to the Emissions Information section:<br><a href="https://www.xiashun.com/public/attachment/images/20240402/9ce62fc62a00d6b64b8a862ec9551a62.pdf">https://www.xiashun.com/public/attachment/images/20240402/9ce62fc62a00d6b64b8a862ec9551a62.pdf</a><br><a href="https://www.xiashun.com/public/attachment/images/20240402/4a515fee37ed96099f846a9b25e14487.pdf">https://www.xiashun.com/public/attachment/images/20240402/4a515fee37ed96099f846a9b25e14487.pdf</a><br><a href="https://www.xiashun.com/public/attachment/images/20240402/6a852c41a50eafd68a0076bb5d152cb4.pdf">https://www.xiashun.com/public/attachment/images/20240402/6a852c41a50eafd68a0076bb5d152cb4.pdf</a> |
| 6.2 Discharges to Water   | Conformance    | The Discharges to Water are covered and managed within the Environmental Management System. The monitoring reports of wastewater discharge in 2023 indicate all major pollutants were monitored, and results for these major pollutants meet the local legal discharge limit.<br>The Entity publicly discloses wastewater discharge information annually in the Environmental Information Disclosure Reports, available at:<br><a href="https://www.xiashun.com/responsibility">https://www.xiashun.com/responsibility</a>   |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance    | An assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil has been completed by the Entity by following the risk assessment process of the   |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | Environmental Management System.   |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance    | Assessment and management of Spills and Leakages is defined in the Entity's ASI Management Manual. Serious Spills and Leakages are handled and communicated by the emergency response team.  |
| 6.4a Reporting of Spills (immediate disclosure)                   | Conformance    | The process for reporting Spills is defined in the Entity's emergency preparedness and action management procedure, and the communication management procedure. The Entity discloses relevant information to affected parties following a Spill/Leakage incident. There have been no Spills since 2020.  |
| 6.4b Reporting of Spills (regular reporting)                      | Conformance    | The reporting of Spills is defined in the emergency preparedness and action management procedure, and information communication management procedure. There have been no Spills since 2020. The Entity publicly discloses information in the 2023 Sustainability Report, refer to the Environmental Protection and Sustainable Development section:<br><a href="https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf">https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf</a>   |
| 6.5a Waste management and reporting (strategy)                    | Conformance    | Waste management is covered by the Environmental Management System. The Entity implements a waste management strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is in compliance with the legal requirements.   |
| 6.5b Waste management and reporting (disclosure)                  | Conformance    | The quantity of Hazardous and Non-Hazardous Waste generated by the Entity is registered in the Solid Waste Information management system and published, refer to the 2023 and 2024 Q1 reports available on the Entity's website:<br><a href="https://www.xiashun.com/responsibility">https://www.xiashun.com/responsibility</a><br>The Entity publicly discloses environmental protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section:<br><a href="https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf">https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf</a> |
| 6.6a Bauxite Residue (storage construction)                       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 6.6b Bauxite Residue (integrity checks and controls)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6c Bauxite Residue (water discharge)                        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6d Bauxite Residue (marine and aquatic environments)        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6e Bauxite Residue (start of the art technologies)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.6f Bauxite Residue (remediation)                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7a Spent Pot Lining (SPL) (storage and management)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7d Spent Pot Lining (SPL) (review of alternatives)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 6.8a Dross (recovery)   | Conformance    | The Aluminium from the Dross pressing is recycled in the Entity's melting furnaces. The remainder is sold to external Dross processers to further extract the remaining Aluminium and re-used to produce Aluminium alloying ingots. |
| 6.8b Dross (recycling)  | Conformance    | The Aluminium from the Dross pressing is recycled in the Entity's melting furnaces. The remainder is sold to external Dross processers to further extract the remaining Aluminium used to produce Aluminium alloying ingots.        |
| 6.8c Dross (review of alternatives)                           | Conformance    | The Entity reviews the internal Dross processing method and Dross sales annually. Dross is not landfilled.  |
| PRINCIPLE 7 WATER STEWARDSHIP                                 |                |   |
| 7.1a Water assessment (mapping)                               | Conformance    | The Entity's water source is municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into Public Drainage System is granted by the government agency.                           |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
| 7.1b Water assessment (risk assessment)                              | Conformance    | The Entity has assessed its water-related risks and determined that the level of water-related risk is low:<br><a href="https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfb62561274ad896a8fd.pdf">https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfb62561274ad896a8fd.pdf</a>   |
| 7.2a Water management (management plans)                             | Not Applicable | This Criterion is not applicable as there are no identified significant water-related risks in the Entity's Area of Influence.   |
| 7.2b Water management (monitoring)                                   | Not Applicable | This Criterion is not applicable as there are no identified significant water-related risks in the Entity's Area of Influence.   |
| 7.3 Disclosure of water usage and risks                              | Conformance    | The Entity has published the water-related risk assessment report:<br><a href="https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfb62561274ad896a8fd.pdf">https://www.xiashun.com/public/attachment/images/20220523/9679a6356debfb62561274ad896a8fd.pdf</a><br>The Entity has publicly disclosed environmental protection information in the annual Sustainability Report, refer to the Environmental Protection and Sustainable Development section:<br><a href="https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddfd.pdf">https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddfd.pdf</a> |
| PRINCIPLE 8 BIODIVERSITY   |                |  |
| 8.1 Biodiversity assessment  | Conformance    | The Biodiversity assessment is included in the Environmental Management System. The Entity is not within or close to any Protected Area, therefore the risk or impact by the operations of the Entity on Biodiversity is low. Further information is available in the Risk Assessment Report of Biodiversity, Ecological System Services and Alien Species:<br><a href="https://www.xiashun.com/public/attachment/images/20240517/a8d3d793d8b8b030a19d0ea91bfef174.pdf">https://www.xiashun.com/public/attachment/images/20240517/a8d3d793d8b8b030a19d0ea91bfef174.pdf</a>   |
| 8.2a Biodiversity management (biodiversity action plans)             | Not Applicable | This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the Entity's Area of Influence.  |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Not Applicable | This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the Entity's Area of Influence.  |
| 8.2c Biodiversity management (reporting)                             | Not Applicable | This Criterion is not applicable as there are no significant risks and impacts on Biodiversity in the  |

| CRITERION   | RATING         | COMMENT   |
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|   |                | Entity's Area of Influence.   |
| 8.3 Alien Species   | Conformance    | The main carrier medium (pallets which is wood) is processed in a way to avoid the introduction of Alien Species.   |
| 8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 8.4b Commitment to "No Go" in World Heritage properties (existing operations)       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 8.5a Mine rehabilitation (best available techniques)                                | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 8.5b Mine rehabilitation (financial provisions)                                     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| PRINCIPLE 9 HUMAN RIGHTS  |                |   |
| 9.1a Human Rights Due Diligence (policy)  | Conformance    | The Entity has established a Human Rights and Business Ethics Policy which is communicated to all employees:<br><a href="https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/images/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a>                 |
| 9.1b Human Rights Due Diligence (process)   | Conformance    | The Entity commits to respect Human Rights and extends this commitment in the supply chain. The Due Diligence process has been established and implemented to cover the supply chain. Due Diligence audits are conducted for major suppliers and the suppliers are required to take any necessary corrective actions based on the findings. |
| 9.1c Human Rights Due Diligence (remediation)                                       | Conformance    | The Entity has established and published the complaints/grievance channel for Stakeholders and defines how to investigate reported cases and take action, including the remedy measures. There have been no adverse impacts reported and therefore remedy is not required.  |
| 9.2 Women's Rights  | Conformance    | Women's rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met. There have been no complaints received from women Workers.   |
| 9.3 Indigenous Peoples  | Not Applicable | This Criterion is not applicable as there are no  |

| CRITERION                                     | RATING         | COMMENT  |
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|   |                | Indigenous Peoples in the Certification Scope of the Entity.   |
| 9.4 Free, Prior, and Informed Consent (FPIC)  | Not Applicable | This Criterion is not applicable as there are no Indigenous Peoples in the Certification Scope of the Entity.  |
| 9.5 Cultural and sacred heritage              | Not Applicable | This Criterion is not applicable as there are no sacred or cultural heritage sites or values within the Entity's Area of Influence.  |
| 9.6a Resettlements (avoid or minimise)        | Not Applicable | This Criterion is not applicable as Resettlement has not been necessary as part of the site's Certification Scope.   |
| 9.6b Resettlements (where unavoidable)        | Not Applicable | This Criterion is not applicable as Resettlement has not been necessary as part of the site's Certification Scope.   |
| 9.7a Local Communities (rights and interests) | Conformance    | The Entity has made a commitment to respect the rights and interests of Local Communities. There have been no complaints received from Local Communities.  |
| 9.7b Local Communities (impacts)              | Conformance    | The control measures for the identified impacts on Local Communities are established and implemented. There are have been no complaints received from Local Communities.   |
| 9.7c Local Communities (livelihoods)          | Conformance    | The Entity employs people from the Local Communities, and prevents adverse impacts to their livelihoods.   |
| 9.8 Conflict-Affected and High-Risk Areas     | Conformance    | <p>The Entity makes a commitment to not using conflict minerals and communicates this through the Aluminium value chain. For further information, please refer to the Responsible Sourcing Policy:</p> <p><a href="https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf">https://www.xiashun.com/public/attachment/image/s/20240208/6bb86d94195511effc0eb82a1d682aae.pdf</a></p> <p>The Entity conducts an analysis to determine if the conflict minerals are used in its Products or the production processes. The result is there are no conflict minerals are used, and no materials are from Conflict-Affected and High-Risk Areas.</p> |
| 9.9 Security practice                         | Conformance    | The Entity implements security practices that respect Human Rights. The outsourced security service provider is qualified by the local authority. The agreement between the Entity and the service provider clearly defines the security   |

| CRITERION  | RATING      | COMMENT   |
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|  |             | responsibility and authorities, and the associated training is provided to the security guards. There have been no complaints received in 2023 regarding the security practices.  |
| PRINCIPLE 10 LABOUR RIGHTS   |             |   |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | There are laws that restrict Freedom of Association in China. However, the Entity commits itself to respect the Workers' rights. There are 105 elected Worker representatives, and the Trade Union is established in accordance with the legal requirement.   |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)  | Conformance | There are laws that restrict Freedom of Association in China. However, the Entity has a Collective Bargaining Agreement for wages covering all employees. The employee representative meeting approved the agreement, and this was also reviewed and registered with the associated government agency.  |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means)      | Conformance | Worker representatives are empowered to convey the concerns of the Workers to the management. The report on grievance handling indicates that all investigations and actions taken in response to complaints or appeals from Workers involve the active participation of the Worker representatives in the relevant activities and processes. |
| 10.2a Child Labour (minimum age)   | Conformance | Child Labour is prohibited in China. There is no Child Labour or young Workers in the Entity. The youngest employee hired in the Entity is over 19 years old.   |
| 10.2b Child Labour (hazardous)   | Conformance | Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in Hazardous working conditions. There is no Child Labour or young Workers at the Entity.   |
| 10.2c Child Labour (worst forms)   | Conformance | Child Labour is prohibited in China. The Entity commits itself and expects its suppliers to comply with the prohibition of Child Labour.  |
| 10.3a Forced Labour (human trafficking)  | Conformance | The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Relevant training about Forced Labour is provided to Workers, and there are no known or reported cases of Forced Labour.  |



| CRITERION   | RATING      | COMMENT   |
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| 10.3b Forced Labour (deposits, fees, advances)                            | Conformance | The Entity is not involved in Forced Labour. All employees are hired directly. Workers are not required to provide any form of deposit; Recruitment Fee or equipment advance.   |
| 10.3c Forced Labour (migrant workers)                                     | Conformance | There are no foreign Migrant Workers at the Entity, all workers are Chinese.  |
| 10.3d Forced Labour (debt bondage)  | Conformance | The Entity is not involved in Forced Labour, and does not provide any type of loan to Workers.  |
| 10.3e Forced Labour (freedom of movement)                                 | Conformance | The Entity is not involved in Forced Labour, and there is no restriction on Workers' movement on-site.  |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | The Entity is not involved in Forced Labour. There is no retention of original copies of Workers' documents, only copies of original documents are kept.  |
| 10.3g Forced Labour (freedom to terminate employment)                     | Conformance | The Workers at the Entity can terminate their employment with a specific notice period in advance without any penalty. The time for announced termination of the employment is in compliance with the Labour Contract Law: 30 days in advance or three days in the period of probation. |
| 10.4 Non-Discrimination   | Conformance | The Entity is committed to non-Discrimination. There has been no case of Discrimination received or found.  |
| 10.5 Communication and engagement   | Conformance | Direct and frequent communication with Workers and Workers' representatives is established. All interviewed Workers state they know how to lodge a complaint or report their concerns.  |
| 10.6 Disciplinary practices   | Conformance | The Entity respects its employees, and disciplinary measures are in compliance with legal requirements and require the confirmation of the Worker involved. Wages are not deducted or reduced for disciplinary reasons.   |
| 10.7a Remuneration (living wage)  | Conformance | The Entity's wage structure is clearly defined, and the basic wage is above the legal minimum wage. The total payment meets the Workers' basic needs, and all Workers are enrolled in the mandatory social insurance scheme.  |
| 10.7b Remuneration (method of payment)                                    | Conformance | All payments are documented and paid timely to all Workers by bank transfer on the 12 <sup>th</sup> day of the following month. All interviewed Workers state   |

| CRITERION   | RATING      | COMMENT  |
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|   |             | they understand the information on their pay slips.  |
| 10.8 Working Time   | Conformance | The working hours are recorded and managed and are in compliance with Chinese Labour Law. The total weekly hours do not exceed 60, and at least one day of rest in a week is guaranteed.   |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY                                       |             |  |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy)                       | Conformance | The Entity is ISO 45001:2018 certified. The Occupational Health and Safety Policy is implemented, reviewed periodically and communicated with Stakeholders:<br><a href="https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf">https://www.xiashun.com/public/attachment/image/s/20240326/fc78e573b52f0863983a5287fd7bdddf.pdf</a> |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)         | Conformance | The Occupational Health and Safety Policy is applied to Workers and visitors in compliance with the legal requirements and the requirements of ISO 45001:2018.   |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Occupational Health and Safety Policy includes a commitment to comply with the legal requirements and other requirements. Systems exist to identify all applicable legal requirements and other requirements and evaluate the legal compliance.  |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)    | Conformance | The Entity has provided Workers with the necessary training courses to understand the hazards, Occupational Health and Safety (OH&S) risks and safe practices relevant to them, and their right to refuse unsafe work.   |
| 11.2 OH&S Management System   | Conformance | The Entity has implemented a documented ISO 45001:2018 Management System and holds a valid ISO 45001:2018 certificate. The Certification Scope is 'Manufacture and Sales of Aluminium and Aluminium-Alloy Foil and Sheet, and covers the Haicang Foil Plant, Huli Foil Plant and Sheet Plant production facilities'.   |
| 11.3 Employee engagement on health and safety                                     | Conformance | In compliance with the legal requirements and OH&S Management System requirements, the Entity has a system of Workers' consultation and participation in health and safety. The management responds to the concerns and advises on OH&S issues from Workers.   |
| 11.4 OH&S performance   | Conformance | The Entity's OH&S targets and improvements are documented in the Occupational Health and   |

| CRITERION | RATING | COMMENT   |
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|           |        | Safety Program. For further information refer to the 2023 Sustainability Report:<br><a href="https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddd.pdf">https://www.xiashun.com/public/attachment/images/20240326/fc78e573b52f0863983a5287fd7bddd.pdf</a> |

**Document Control and Version History**

| Revision | Date            | Notes  |
|----------|-----------------|--|
| 0        | 17 July 2019    | Initial Certification Audit – Full Certification   |
| 1        | 29 October 2021 | Surveillance Audit; Certification Scope revised to update the products and processes and shorten the description of the site locations; Revised the processes listed in the Audit Scope description for the Initial Certification Audit. |
| 2        | 26 July 2022    | Re-Certification Audit – Full Certification<br>Certification Scope updated to more accurately represent the Entity's products and processes.   |
| 3        | 4 July 2024     | Surveillance Audit   |