
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**JIANGSU ZHONGJI
LAMINATION
MATERIALS CO.,
LTD**

CERTIFICATE
NUMBER

37

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

5 AUGUST 2022

DATE OF EXPIRY

4 AUGUST 2025

CERTIFIED SINCE

5 AUGUST 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Stewardship Initiative Ltd'.

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

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiayangin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
CERTIFICATION SCOPE	Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (12 – 13 June 2019)Surveillance Audit (26 – 27 September 2021)Re-Certification Audit (29 – 30 August 2022)Surveillance Audit (3 – 4 July 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">12 – 13 June 2019 (Initial Certification Audit)26 – 27 September 2021 (Surveillance Audit)29 – 30 August 2022 (Re-Certification Audit)3 – 4 July 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 June 2019 (Initial Certification Audit)13 October 2021 (Surveillance Audit)11 November 2022 (Re-Certification Audit)2 September 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 13 June 2019)</u> Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation)

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

Surveillance Audit (26 – 27 September 2021)

Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Re-Certification Audit (29 – 30 August 2022)

Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Surveillance Audit (3 – 4 July 2024)

Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

5 August 2022 – 4 August 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

4 August 2025

CERTIFICATE
NUMBER

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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 that conform to the ASI Performance Standard legal compliance requirements. The Entity has implemented systems to maintain awareness of and ensure Compliance with Applicable Law. The relevant training courses are provided to the employees.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has established the Policy and procedures to manage issues on Anti-Corruption, e.g., Gift and Entertainment Policy, and a whistleblowing mechanism. An Anti-Corruption Commissioner has been appointed. Training is provided to the employees who are at higher risk. A register of misconduct is maintained, with no Corruption case reported in the previous three years. However, the risk assessment process is currently incomplete.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity implements adequate measures, including training and communication to raise awareness of the Code among business partners and suppliers. The Code of Conduct and Responsible Sourcing Policy are published at: http://www.zjalufoil.com/WebEditor/upload/download/20240701102426.pdf and http://www.zjalufoil.com/WebEditor/upload/download/20240701102301.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented management Policies that are consistent with environmental, social, and governance practices. For further details, refer to: http://www.zjalufoil.com/WebEditor/upload/download/20240701102341.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management has demonstrated commitment to the implemented Policies. The effectiveness of these Policies and procedures is reviewed by senior management in the annual management review meeting.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal and external Stakeholders by training, publishing on the website and posts on-site. Further information is available at:

CRITERION	RATING	COMMENT
		http://www.zjalufoil.com/WebEditor/upload/download/20240701102341.pdf
2.2 Leadership	Conformance	A senior Management Representative has been nominated. During the audit interviews, all relevant staff demonstrated a good level of knowledge on sustainability issues.
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. The scope of the external certifications covers the Entity's ASI Certification Scope.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented a social Management System based on the ASI Performance Standard. The Entity holds a valid ISO 45001:2018 certificate.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Due Diligence audits 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 published at: http://zjalufoil.com/WebEditor/upload/download/20240701102301.pdf
2.5 Impact Assessments	Not Applicable	This Criterion is not applicable as there have been no New Projects or Major Changes since the Entity became an ASI Member.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans on social, Occupational Health and Safety (OH&S) and environmental accidents have been implemented and training has been provided. The Emergency Response Plan related to confined space entry has been established. All employees including the office staff attended evacuation drills in 2023 and 2024.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions. No such activity has occurred in the past three years. The Entity commits that in any future mergers and acquisitions, it will re-examine environmental, social, and governance issues during the Due Diligence process.

CRITERION	RATING	COMMENT
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. No such activity has occurred in the past three years. The Entity commits to re-evaluate relevant environmental, social, and governance issues in any future closures, retirements, or divestments.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its Sustainability Report 2023, available at: http://zjalufoil.com/WebEditor/upload/download/20240701102454.pdf
3.2 Non-compliance and liabilities	Conformance	Information on non-compliance and liabilities is disclosed on the official websites of relevant government and non-government agencies and in the Entity's Sustainability Report 2023, available at: http://zjalufoil.com/WebEditor/upload/download/20240701102454.pdf Since 2022, the Entity has not incurred significant fines, judgments, penalties, or non-economic sanctions for violating applicable laws.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's Financial Audit Report 2023 has been verified by a third-party audit firm and discloses payments to governments that are legally required, such as tax. No other payments are reported. The Entity has implemented an Anti-Corruption Policy.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented internal and external whistleblowing/ complaints/ grievance mechanisms e.g., 'whistleblower' hotlines, mail address and a suggestion box. Refer to: http://zjalufoil.com/contact/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted and documented an environmental Life Cycle Assessment (LCA). The assessment is in the format defined by the Entity, not as per relevant ISO standards.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report includes adequate cradle-to-gate information on the Entity's Aluminium foil product. The LCA report can be provided to customers upon request.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The Entity has published the LCA report on its website, available at: http://zjalufoil.com/WebEditor/upload/download/20240701100432.pdf</p> <p>The Entity has documented a management procedure on information disclosure to detail the process for communicating with customers.</p> <p>However, the LCA report summary is insufficient with respect to some key technical information not being presented.</p>
4.2 Product design	Conformance	<p>The Entity has implemented a process to establish clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. The Entity has defined the production conformance rate to reduce the waste generated in the production process.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>Aluminium Process Scrap is collected, packaged and sold to a smelter or other manufacturer of construction materials for recycling. The recycling rate is 100%.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has undertaken a risk analysis and determined that the Aluminium Process Scrap generated by the Entity does not require separation for recycling.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has implemented a strategy for recycling discarded products, including a timetable, activities, and objectives. The Entity has publicly disclosed its waste aluminium recycling action plan and aims to have 15% Recycled Aluminium as raw material by 2030, available at: http://zjalufoil.com/WebEditor/upload/download/20240701103025.pdf</p> <p>The Entity has communicated with major suppliers to discuss increasing the recycling rate of discarded products.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>Due to the lack of local, regional, or national Aluminium scrap collection and recycling systems in China at present and the Entity not having a smelting process, the Entity does not directly procure Recycled Aluminium. Therefore, the Entity primarily collaborates with customers and suppliers to gradually increase the use of Recycled Aluminium in raw materials. Currently, the proportion of Recycled Aluminium in raw materials has reached approximately 10%.</p>

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity has monitored and documented its main Scope 1 and Scope 2 GHG Emissions: http://zjalufoil.com/WebEditor/upload/download/20240704093247.pdf</p> <p>The conversion factors used in the GHG Emissions calculations have been determined through a GHG protocol defined by the Jiangsu Government. The GHG Emission report is not verified by a Third Party. However, it was noted that the overall Scope 1 GHG emissions calculation remains incomplete.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has established and implemented its GHG Emissions reduction plan for 2022-2028: http://zjalufoil.com/WebEditor/upload/download/20240701100857.pdf</p> <p>The Entity plans to reduce the GHG emissions intensity of its Products during the production process from 0.8t CO₂e/tonne in 2022 to 0.25t CO₂e/tonne by 2028. In addition to planning to use renewable electricity to reduce GHG emissions in the manufacturing process of its Products, the Entity also plans to procure more raw materials for producing Recycled Aluminium to further reduce the carbon footprint of its Products.</p>
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	Minor Non-Conformance	<p>The Entity has implemented plans to minimise adverse impacts from air emissions. The waste air generated in the operation is collected and treated prior to release. The monitoring results indicate that the Entity's Emissions to Air comply with the legal emissions limit. However, the Entity has not conducted emissions testing associated with the cafeteria to confirm that the fume emissions comply with the regulatory limits.</p>
6.2 Discharges to Water	Conformance	Discharges to Water is covered and managed within the Environmental Management System. Water discharges comply with the local legal limit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of risk areas of operations where Spills and Leakage may contaminate air, water and soil is

CRITERION	RATING	COMMENT
		undertaken by implementing the risk assessment process in the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Based on the results of risk identification and assessment, the emergency preparedness and response plan for Spills and Leakage of chemicals has been established and includes processes for external communication and methods to prevent Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills and Leakage is defined in the Emergency Response Plan. The procedure to disclose significant Spills to all affected parties (such as local community, neighbours) is prescribed in the Emergency Response Plan. There have not been any significant Spills to report since the Entity commenced operation at the existing location.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has established a procedure to publish the Impact Assessments of the Spills and Leakage and remediation actions taken in the annual Sustainability Report. There was no Spill or Leakage in 2021 to 2023 period, and this information is included in the annual Sustainability Report 2023, Section 3, page 6: http://zjalufig.com/WebEditor/upload/download/20240705093002.pdf
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the Environmental Management System and has been designed in accordance with the Waste Mitigation Hierarchy. The management procedure for Hazardous and Non-Hazardous Waste is established and implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The nature and quantity of Hazardous Waste generated by the Entity is registered in the Solid Waste Information Management System. Information on the management of Non-Hazardous Waste and the associated disposal methods is published in the Sustainability Report, Section 3.2 and 3.3: http://zjalufig.com/WebEditor/upload/download/20240705093002.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water-related risk assessment covering the Entity's own operation and its Area of Influence has been conducted. The water source is the municipal water supply and water usage is tracked and documented.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks have been assessed for the Entity. For further information, refer to: http://zjalufoil.com/WebEditor/upload/download/20240701103051.pdf
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as the water-related risks were identified and assessed as low risk. No wastewater is generated from the production process.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as the water-related risks were identified and assessed as low risk. The

CRITERION	RATING	COMMENT
		water consumption is monitored monthly and wastewater discharge monitored annually.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed the water-related risk assessment report and Water Balance Map: http://www.zjalufig.com/WebEditor/upload/download/20220829012135.pdf http://www.zjalufig.com/WebEditor/upload/download/20190528030857.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A Biodiversity Impact Assessment for the Entity's activities and within its Area of Influence was conducted by a qualified Third Party and included in the Environmental Management System. The report confirmed that there were no significant risks and/or impacts on Biodiversity due to the nature of the Entity's Products and the production. The Entity is also not located or close to any Protected Areas. The Biodiversity Risk Report is available at: http://www.zjalufig.com/WebEditor/upload/download/20240701102223.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as there were no significant impacts to biodiversity from the Entity's operations.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as there were no significant impacts to biodiversity from the Entity's operations.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as there were no significant impacts to biodiversity from the Entity's operations.
8.3 Alien Species	Conformance	The main carrier medium (wooden pallets) is processed in a way to avoid the introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 Policy commitment and communicated the Policy to all employees. All interviewed Workers state they understand the Policy. No negative information on Human Rights associated with the Entity have been identified.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commits to respect Human Rights. The Due Diligence process has been established and covers the supply chain. The process includes identifying and assessing the risks on Human Rights, and taking actions to prevent and mitigate its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and published a complaints/grievance channel which is available to Stakeholders. A remediation process for any adverse Human Rights impact has been established. No significant negative impacts on Human Rights have been reported.
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. The Entity has identified legal rights for women and implemented control measures to ensure these are met.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples. However, Policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) have been established.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples. However, Policies and processes to ensure respect for the rights and interests of Indigenous Peoples including Free, Prior, and Informed Consent (FPIC) have been established.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sites of cultural or sacred heritage in the Entity's Area of Influence. However, Policies and procedures to protect cultural and sacred heritage have been established.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as Resettlement or displacement has not been conducted by the Entity. However, the Entity has established a procedure on resettlement.

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as Resettlement or displacement has not been conducted by the Entity. However, the Entity has established a procedure on resettlement.
9.7a Local Communities (rights and interests)	Conformance	The Entity has a policy for respecting the legal rights and interests of the Local Community. The impact of environmental pollution on the Local Communities has been identified in the risk assessment and the Environmental Management System has been established to reduce the risk. There have been no complaints received from Local Communities.
9.7b Local Communities (impacts)	Conformance	The impact of environmental pollution on the Local Communities has been identified in the risk assessment and the Environmental Management System has been established to reduce the risk. There have been no complaints received from Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a close relationship with the Local Communities. More than half of the Entity's employees are from the Local Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity makes a commitment to not using conflict minerals and communicates this through the aluminium value chain. As one of its due diligence measures, the Entity and its suppliers sign a commitment letter to not use conflict minerals. As per the risk assessment, there are no materials in products or the production processes from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity commits in its involvement with public and private security providers, to respect Human Rights in accordance with the ASI Performance Standard and good practice. Security personnel receive training courses on respecting labour rights and job duty and understood the requirements. There have been no complaints received on the security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable as there are laws that restrict Freedom of Association in China.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has a Policy on respecting rights to Freedom of Association and Collective Bargaining. There are no Collective Bargaining Agreements in the Entity.

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity demonstrates they respect the right to Freedom of Association and Collective Bargaining. Workers' representatives can deal with Workers' concerns with management on behalf of Workers. The interviewed Worker representative and Workers understand the mechanism. There are 60 elected worker representatives, including approximately one-third who are female workers.
10.2a Child Labour (minimum age)	Conformance	There is no Child Labour or young Workers in the Entity. At the time of the Audit, it was confirmed that the youngest Worker was born in June 2005 and joined the Entity in July 2024.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions. There is no Child Labour or young Workers in the Entity as per review of records and management and worker interviews.
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. There is no Child Labour or young Workers in the Entity.
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. No case of Forced Labour is reported or known in the Entity.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour. All employees are hired directly. As per the review of records and management and worker interviews, Workers are not required to provide any form of deposit, recruitment fee or tool fee.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign Migrant Workers in the Entity, all Workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans to Workers. A review of records and management and worker interviews confirmed no case of Debt Bondage is found or known in the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of Workers' movement at the Entity.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of original documents of Workers, only copies of original documents are kept in Workers' personnel files.

CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The signed labour contracts do not contain language to limit the Workers' ability to voluntarily terminate their employment. The Workers know their rights to terminate their employment without penalty, and the required notice time is in compliance with the labour Contract Law, which is 30 days in advance or three days during probation.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. No case of Discrimination has been received. The Workers interviewed felt they are treated equally.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and Worker representatives is established. The communication channels are published and available to all Workers.
10.6 Disciplinary practices	Conformance	The Entity has established disciplinary measures that are in compliance with legal requirements and require the confirmation of the involved Worker.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, the basic wage is above the legal minimum wage. The total payment meets the Workers' basic need.
10.7b Remuneration (method of payment)	Minor Non-Conformance	All payments are documented and paid to all Workers via bank transfer on the 15 th of the following month. Workers receive their payslip on this day. However, it was identified that the severance pay for departing employees was typically not settled in a timely manner.
10.8 Working Time	Conformance	Working hours are recorded manually. Working hours are monitored and are generally in Compliance with China Labour Law, which prescribes regular working hours of 40 hours, five days a week. The maximum Overtime working hours do not exceed three hours a day. The Entity holds a valid 'Comprehensive Working Hours Approval' and the annual total working hours do not exceed 2,432 hours. The total weekly working hours do not exceed 60 hours, and one day off in every seven is guaranteed.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	In conformance with the ISO 45001:2018, the Occupational Health and Safety (OH&S) Policy is defined, implemented, reviewed periodically and communicated with Stakeholders: http://zjalufoil.com/WebEditor/upload/download/20240701102454.pdf

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to Workers and Visitors in compliance with the legal requirements and conformance with the requirements of ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an OH&S Policy that includes a commitment to comply with the legal and other requirements. The Entity identifies all applicable legal requirements and other requirements and evaluates the legal compliance periodically in conformance with the requirements of ISO 45001:2018.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided the training courses to understand the hazards, OH&S risks and actions determined that are relevant to them, and understand the right to refuse unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented and certified ISO 45001:2018 OH&S Management System. However the 2023-2024 annual fire facility inspection was not conducted as legally required.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a system for Worker consultation and participation in Health and Safety. The Entity encourages employees to report issues of concern regarding health and safety, among other employee concerns, and participate in the development and implementation of improvement plans through mechanisms such as the "proposal system" and setting of KPIs. Worker representatives regularly attend OH&S meetings, where management and Worker representatives discuss and develop solutions in response to concerns and suggestions related to OH&S.
11.4 OH&S performance	Conformance	Occupational Health and Safety targets and improvements are documented in the Entity's OH&S program. There has been no reportable major accident, fatal accident, nor occupational illness case in the past two years. The Entity has published its OH&S performance including targets in the Sustainability Report 2023, (Chapter 2): http://zjalufig.com/WebEditor/upload/download/20240701102454.pdf

Document Control and Version History

Revision	Date	Notes
0	5 August 2019	Initial Certification Audit – Full Certification
1	10 November 2021	Surveillance Audit

2	2 December 2022	Re-Certification Audit – Full Certification
3	20 September 2024	Surveillance Audit