
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

SHANGHAI SUNHO ALUMINUM FOIL CO., LTD.

CERTIFICATE
NUMBER

19

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

28 FEBRUARY 2022

DATE OF EXPIRY

27 FEBRUARY 2025

CERTIFIED SINCE

28 FEBRUARY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', 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*

CERTIFICATION SCOPE

Shanghai Sunho Aluminum Foil Co., Ltd. located in
Shanghai, China which manufactures Aluminium
and Aluminium alloy foils.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	Shanghai Sunho Aluminum Foil Co., Ltd.
CERTIFICATION SCOPE	Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which manufactures Aluminium and Aluminium alloy foils.
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">• Certification Audit (21 – 25 January 2019)• Surveillance Audit (15 – 17 September 2020)• Re-Certification Audit (10 – 11 January 2022)• Surveillance Audit (27 – 28 June 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 21 – 25 January 2019 (Certification Audit)• 15 – 17 September 2020 (Surveillance Audit)• 10 – 11 January 2022 (Re-Certification Audit)• 27 – 28 June 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 3 February 2019 (Certification Audit)• 19 October 2020 (Surveillance Audit)• 2 March 2022 (Re-Certification Audit)• 22 August 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Certification Audit (21 – 25 January 2019)</u> The Audit Scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision Aluminium and Aluminium alloy foils.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (15 – 17 September 2020)

The Audit Scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision Aluminium and Aluminium alloy foils.

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 (10 – 11 January 2022)

The Audit Scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision Aluminium and Aluminium alloy foils.

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 (27 – 28 June 2023)

The Audit Scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Kangqiao Industrial Zone Pudong, Shanghai, China. The main products cover high-precision Aluminium and Aluminium alloy foils.

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

28 February 2022 – 27 February 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

27 February 2025

CERTIFICATE
NUMBER

19

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 legal compliance requirements of the ASI Performance Standard. The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established Policies and procedures on Anti-Corruption, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has appointed an Anti-Corruption Commissioner.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct which include principles related to environmental, social and governance performance. The Entity has implemented adequate control measures, including training, communication to raise awareness of the Code among business partners and suppliers. More information can be found via: http://www.shalfoil.com/NewsDetail.aspx?ID=3250
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Policies are consistent with the environmental, social, and governance practices included in the ASI Performance Standard. For further information, refer to: http://www.shalfoil.com/NewsDetail.aspx?ID=2841
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrate commitment to the implemented Policies. The Policies are reviewed in the annual management review meeting.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are available for internal Stakeholders through training and display on-site and available for external Stakeholders via the website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2841
2.2 Leadership	Conformance	A senior Management Representative has been appointed, and the responsibility and authority have both been clearly defined.
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.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented.
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 at major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel are trained annually on Responsible Sourcing requirements. The Responsible Purchasing Policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are implemented in accordance to the ASI Performance Standard requirements, ISO 14001 and ISO 45001 Management System standards and the relevant legal requirements.
2.6 Emergency Response Plan	Conformance	Emergency Response Plans for social, Occupational Health and Safety (OH&S) and environmental accidents are implemented, with Workers receiving training and drills are conducted regularly.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a procedure for Mergers and Acquisitions, however no such activity has occurred since the Entity commenced operations at the location in 2004.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment, however no such activity has occurred since the Entity commenced operations at the location in 2004.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publishes an annual Sustainability Report which is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3249 The Report is written in the company format and is currently not verified by a third party.
3.2 Non-compliance and liabilities	Conformance	The Sustainability Report includes information on legal compliance and other relevant details. The content pertaining to legal compliances and liabilities was verified on relevant Government websites during this audit. The Sustainability Report is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3249
3.3a Payments to governments (legal and contractual)	Conformance	Payments to Government are included in the Entity's Finance Report, which is audited by a third party. All

CRITERION	RATING	COMMENT
		payments are made in accordance with all legal requirements.
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 internal and external Complaints Resolution Mechanisms, including a whistleblower hotline, email address and an on-site suggestion box. The available channels are communicated to Stakeholders.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The environmental Life Cycle Assessment (LCA) has been conducted and documented, encompassing all Aluminium products and product lines. However, the accounting and representation of relevant data for Aluminium raw materials, which have a significant impact, are unclear.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The environmental Life Cycle Assessment (LCA) provides cradle-to-gate information covering all Aluminium products and product lines. The LCA can be provided by external communication if required. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Life Cycle Assessment (LCA) is published on the Entity's website at: http://www.shalfoil.com/NewsDetail.aspx?ID=3207 The Entity defines how to communicate on the LCA with the customer in the Management Procedure of Information Disclosure.
4.2 Product design	Conformance	Throughout the product development process, environmental impacts such as energy consumption, waste reduction and recycling are considered. Targets for these aspects are defined at the product development stage.
4.3a Aluminium Process Scrap (targets)	Conformance	Aluminium Process Scrap is collected, packaged, and sold to a smelter or other manufacturers of construction materials for recycling, which has achieved a recycling rate of 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Based on the results of the material analysis, the Entity's Aluminium Process Scrap does not require separation for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	For post-customer Scrap at the end of their life cycle, it is not feasible, from both financial and quality perspectives, to recycle Scrap in the foil manufacturing

CRITERION	RATING	COMMENT
		process. The Entity plans to collaborate with suppliers to improve the circular economic practices.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	As there are currently no local, regional or national collection and recycling systems for Aluminium Scrap, the Entity is working with customers to determine ways to enhance product recycling rates at the end of their lifecycle.
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 2 Greenhouse Gas (GHG) emissions are monitored, documented: http://www.shalfoil.com/NewsDetail.aspx?ID=3205 The GHG emissions are not third party verified. However, not all emission sources are disclosed and the conversion factor for electricity is also not provided.
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity sets a GHG emission reduction target annually. For 2023, reduction targets are established for two major emission sources: fire extinguisher use and electricity consumption. Associated measures are also implemented. The GHG emission target for 2023 is published at: http://www.shalfoil.com/NewsDetail.aspx?ID=3204 However, the Entity's reduction targets lack clear specifics regarding reduction intensity or specific measures.
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	Waste air generated during operations and in the kitchen is collected and treated before being released. Emissions to Air are monitored periodically to ensure compliance with local emission limits.
6.2 Discharges to Water	Conformance	Discharges to Water are managed under the Environmental Management System. Water discharges are monitored periodically to ensure compliance with the local discharge limits.

CRITERION	RATING	COMMENT
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 has been undertaken by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of Spills and Leakage is defined in the Environmental Management System. Major Spills and Leakages are managed and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Reporting of Spills is defined in the Entity's Management Procedure of Information Disclosure. There has been no Spill in the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of Spills and the remediation actions taken are published in the annual Sustainability Report. There has been no Spill in the past three years.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is addressed by the Environmental Management System. The transfer of Hazardous Waste is subject to periodic audits, and its disposal complies with legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity is recorded in the Solid Waste Information Management System and reported in the Chapter 7 of the Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=3249
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.
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.

CRITERION	RATING	COMMENT
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 Entity's water source is the municipal water supply and usage is tracked and documented. The legal required Permit for Water Discharge into Public Drainage System has been granted by the government agency.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks have been assessed by the Entity, and the level of water-related risk is low.
7.2a Water management (management plans)	Conformance	Water consumption reduction targets have been established, and the associated control measures are defined and documented.
7.2b Water management (monitoring)	Conformance	Water consumption is monitored and progress toward achieving the water-related targets is assessed. The reduction target for 2022 was met.
7.3 Disclosure of water usage and risks	Conformance	In accordance with the Management Procedure of Information Disclosure, the water-related risk assessment report and the water consumption report for 2022 have been published at: http://www.shalfoil.com/NewsDetail.aspx?ID=2812 and http://www.shalfoil.com/NewsDetail.aspx?ID=3206

PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	The biodiversity assessment is included in the Environmental Management System. The Entity is not within, nor close to any Protected Area and the impact
-----------------------------	-------------	--

CRITERION	RATING	COMMENT
		of the Entity's operations on biodiversity operations is low. For further information, refer to: http://www.shalfoil.com/NewsDetail.aspx?ID=2811
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations has been assessed as very low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations has been assessed as very low.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the impact on biodiversity from the Entity's operations has been assessed as very low.
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.
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 implemented a Policy commitment to respect Human Rights and communicates the Policy to all employees: http://www.shalfoil.com/NewsDetail.aspx?ID=2841
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 is established covering the supply chain including employment (labour) agencies and sub-contractors.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has established and has published a complaints/grievance channel for Stakeholders. There has been reported cases where the Entity have caused or contributed to Human Rights impacts.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	Women's legal rights and interests are respected. There have been no complaints received from women Workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there are no Resettlement activities required.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there are no Resettlement activities required.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of local Communities. There have been no complaints received from local Communities. An interviewed worker from the local Community stated that the Entity maintains a good relationship with them.
9.7b Local Communities (impacts)	Conformance	The Entity has established and implements control measures for the identified impacts on local Communities. There have been no complaints received from the local Community.
9.7c Local Communities (livelihoods)	Conformance	The Entity employs people from the local Community which supports their livelihoods by providing local employment opportunities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has made a commitment prohibiting the use of conflict minerals and communicates this through the Aluminium value chain. Further information, refer to: http://www.shalfoil.com/NewsDetail.aspx?ID=2816 There has been no complaint received on this issue.
9.9 Security practice	Conformance	The Entity implements security practices that respect Human Rights. Responsibilities and authorities are clearly defined in the security agreement and security staff undergo relevant training. No complaint or grievance regarding security staff or practices has been received.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity commits itself to respecting Workers' rights. There are 54 elected Worker representatives including eight women, and a Labour Union has been established in accordance with legal requirement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects Workers' rights to Collective Bargaining, but there are no Collective Bargaining Agreements in place.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Workers can access the suggestion box, email, hotline or directly communicate with management to report their concerns or complaints.
10.2a Child Labour (minimum age)	Conformance	Based on the review of records and management and worker interviews, the Entity does not utilise or support the use of Child Labour or young Workers.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in China. Young Workers aged 16 to 18 are under special legal protections and are not permitted to work in hazardous conditions. The Entity complies with local legal requirements.
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 and protection of young Workers.
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.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not engage in Forced Labour. Workers are not required to provide any form of deposit, recruitment fee or equipment advance.
10.3c Forced Labour (migrant workers)	Not Applicable	This Criterion is not applicable as there are no foreign Migrant Workers at the Entity and all workers are Chinese.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not engage in Forced Labour and does not provide loans to Workers. There have been no reported or discovered instances of Debt Bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not engage in Forced Labour and there are no restrictions on the movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not engage in Forced Labour. It does not retain Workers' original documents; only copies are kept in Workers' personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not engage in Forced Labour. The notice period for termination of employment is in

CRITERION	RATING	COMMENT
		compliance with the Labour Contract Law: 30 days in advance or three days during the period of probation.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. There have been no instances of Discrimination received.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers representatives has been established. This communication is efficient, as evidenced by the Labour Union Committee meeting minutes and interviews with workers and management.
10.6 Disciplinary practices	Conformance	The Entity respects its employees, ensuring that disciplinary measures are not associated with inhumane actions, harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation. Such measures require the confirmation of involved Workers.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, with the basic wage exceeding the legal minimum. The total payment meets the Workers' basic needs. Payslips are digitally provided to Workers privately through an application, which includes all necessary information.
10.7b Remuneration (method of payment)	Conformance	All payments to Workers are documented and made promptly via bank transfer on 15 th of the following month. Payslip are provided privately to Workers through a digital application and includes all necessary information.
10.8 Working Time	Minor Non-Conformance	Working hours are recorded manually. Working hours are monitored to ensure that the total does not exceed 60 hours per week. However, it was noted that a few Workers exceeded the legal limit from January to March 2023, totalling 608 hours for the quarter.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established and implemented an Occupational Health and Safety (OH&S) Policy, which is reviewed periodically and communicated to Stakeholders. For more information, refer to: http://www.shalfoil.com/NewsDetail.aspx?ID=2841
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's OH&S Policy applies to both Workers and visitors, which is in compliance with legal requirements as well as the standards set by ISO 45001:2018.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy reflects the Entity's commitment to complying with the legal and other relevant requirements. Systems have been established to

CRITERION	RATING	COMMENT
		identify all applicable legal requirements and assess compliance with them. The latest legal compliance evaluation was conducted in December 2022. There were no violations related to OH&S issues raised.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are provided with training courses to understand the hazards, OH&S risks and relevant actions, as well as their rights 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.
11.3 Employee engagement on health and safety	Conformance	In compliance with the legal requirements and the OH&S Management System, the Entity has established a system for Workers' consultation and participation in Health and Safety matters. Union representatives regularly participate in Health and Safety meetings, where management addresses concerns and advice on OH&S issues raised by Workers.
11.4 OH&S performance	Minor Non-Conformance	Health and safety targets and improvements are documented in the OH&S Programme. For further information, refer to: http://www.shalfoil.com/NewsDetail.aspx?ID=3249 However, the Entity does not evaluate its OH&S performance using leading and lagging indicators, nor has it conducted a peer comparison.

Document Control and Version History

Revision	Date	Notes
0	28 February 2019	Issued
1	30 October 2020	Surveillance Audit
2	2 June 2021	Updated to reflect a change in the name of the Member to Shanghai Sunho Aluminum Foil Co.,Ltd.
3	30 March 2022	Re-Certification Audit; Adjust Certification Scope wording to improve legibility.
4	15 October 2024	Surveillance Audit Individual ASI Membership for Shanghai Sunho Aluminum Foil Co., Ltd. was superseded and the Entity has been included under the HENAN SUNHO COAL & POWER CO., LTD membership.