

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.

CERTIFICATE NUMBER
133

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
TÜV RHEINLAND CERT
GMBH

DATE OF ISSUE
7 JULY 2024

DATE OF EXPIRY
6 JULY 2027

CERTIFIED SINCE
7 JULY 2021

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production of the aluminium re-
melting, refining and semi-
fabrication activities associated
with the manufacture of aluminium
foils, plates, sheets and strips.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.
ENTITY NAME	CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.
CERTIFICATION SCOPE	Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foils, plates, sheets and strips.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (23 – 25 March 2021)Surveillance Audit (13 – 15 February 2023)Re-Certification Audit and Scope Change (22 – 24 July 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">23 – 25 March 2021 (Initial Certification Audit)13 – 15 February 2023 (Surveillance Audit)22 – 24 July 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 April 2021 (Initial Certification Audit)23 April 2023 (Surveillance Audit)19 September 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 25 March 2021)</u></p> <p>The Audit Scope included the aluminium re-melting, refining and semi-fabrication associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (13 – 15 February 2023)</u></p> <p>The Audit Scope included the production of the aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of aluminium foil and plate at the whole Entity excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.</p>

Supply chain activities included in the Audit Scope:

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

All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (22 – 24 July 2024)

The Audit Scope included Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foil and plate, excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.

Supply chain activities included in the Audit Scope:

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

All applicable 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 company's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 7 July 2024 – 6 July 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 6 January 2026

CERTIFICATE NUMBER 133



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

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

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

ENTITY OVERVIEW

CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD. (the 'Entity'), established in March 1996, is located at Yangzonghai, Kunming City, Yunnan Province, China and covers a total area of 280,000 square meters. . The Entity is a wholly owned subsidiary of CHINALCO Aluminum Group. It specializes in the processing, sales, and production technology research and development of Aluminium foil and plate. The main products include single and double zero Aluminium foil blanks, aluminium decorative strips, cathode plates, electronics, power capacitor foils, sterile packaging foils, tobacco foils, pharmaceutical foils, battery foils, insulation material foils, etc. The products are popular domestically and exported to Southeast Asia, South Asia, Europe, the United States of America and other countries.

The Entity's main production processes include casting, extrusion and machining, with a designed production capacity of 350,000 tonnes per year. There are seven workshops and one office building, including 17 casting and rolling mills, three cold rolling mills, and 10 Aluminium foil rolling mills. The Entity is equipped with a reuse water treatment station, air compression station, hazardous waste warehouse, and general solid waste warehouse.

The Entity employs over 800 employees, and its main stakeholders include shareholders, customers, partners, upstream supply chains, and government-related departments (such as the tax authorities). The Entity's continuous development plan provides employment opportunities for nearby residents, and drives the economic development of the surrounding areas.

The Entity is committed to the concept of green development and a sustainable Aluminium industry supply chain that covers the entire process of Aluminium recycling, casting, extrusion, and machining processing. The Entity has been awarded numerous honorary innovation titles.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	High
RISKS	High	High	High	High
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has an established procedure to collect Applicable Laws and regulations. The legal, EHS and Human Resources departments are responsible for the collection of and an least annual assessment of Applicable Law, which covers the areas of labour, ethics, health and safety and the environment. The Entity's parent company provides qualified advice and the Entity has engaged a full-time qualified lawyer.
1.2 Anti-Corruption	Conformance	The Entity has implemented a Business Ethics Policy, which addresses anti-extortion and Bribery, and training is provided to employees. The Entity has established a Code of Conduct, which addresses Corruption, and is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html Details of the ethics reporting channel is posted in the meeting room and canteens. A Due Diligence investigation on the high-risk positions in the Entity, such as in the purchasing, sales, quality, and warehouse departments, was undertaken and staff in these departments are required to sign an Honesty Commitment Letter. Internal audits on ethics are conducted at least once every half year.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct and provides training to workers periodically. The Code of Conduct is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html The Entity has communicated the Code of Conduct to their suppliers and requires them to sign a commitment letter. The Entity's ASI Policy is included in the 2023 Sustainability Report: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained a series of Policies consistent with the relevant environmental, social, and governance practices. The Policies have been approved by the General Manager and supported through provision of resources. The Entity's Management System requires review of the Policy annually as part of the management review process. Additionally, any changes to the business that could affect environmental, social, or governance risks, or any indication of a control gap require a review of the Policy. The most recent review was conducted in January 2024. The Policies are communicated internally through orientation, training, and displays and external parties can access the Policies from the website, available at: https://ylgf.chinalco.com.cn/xwzx/ywgg/202407/P020240722305767854210.pdf
2.2a-c Leadership	Conformance	The Entity has nominated a Management Representative and the responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented the Environmental Management System, certified against ISO 14001:2015 (valid until 31 May 2027). There have been no fines or requests for corrective actions from government agencies or other Stakeholders.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System and complies with legal requirements. An annual Compliance evaluation is conducted, with no fines or requests for corrective actions from government agencies and other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Sourcing Management Procedure and a Responsible Sourcing Policy that both aim to communicate the environmental, social, and governance aspects to the Entity's raw and auxiliary materials suppliers and contractors. The Entity has communicated these Policies to all suppliers and contractors through the ESG commitment letters. The Responsible Sourcing Policy is available at the website: https://ylgf.chinalco.com.cn/xwzx/ywgg/202407/P020240722305767854210.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, the Entity has evaluated the environmental, social, cultural and Human Rights impacts as part of the Environmental Impact Assessments, as well as evaluating the effectiveness of occupational hazard controls during the Entity's initial construction.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, the Entity has established a Human Rights Impact Assessment process and disclosed its performance on Human Rights in its Sustainability Report
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity has established Emergency Response Plans to address any potential for an Aluminium powder explosion and excessive discharge of domestic sewage and emissions. All employees are trained on the Emergency Plan with regular drills undertaken. The Entity has submitted an emergency plan with the local Ecology and Environment Bureau and Emergency Management Centre. The Emergency Response Plan for the environment is disclosed at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240824_134261.html However, the Emergency Response Plan for health and safety is not published.
2.8a-d Suspended Operations	Conformance	The Entity has established a management procedure for the Suspension of Operations, including a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, that considers Material adverse environmental, social and governance impacts. The Entity reviews its Business Resilience Plan every five years and on any indication of a control gap or after any changes to the Business that alter the nature or scale of environmental, social and governance risks.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management control procedure for investments and acquisitions. Currently, there is no merger or acquisition activity proposed.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management control procedure for closure, decommissioning and divestment. No such event occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainability Report addresses the Entity's Material impact and governance approach to environmental, social and economic topics, and is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
3.2 Non-compliance and Liabilities	Conformance	The Entity provides information on non-compliance and liabilities in its 2023 Sustainability Report, page 19: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html No fine or punishment was imposed by the government during 2021 to 2023.
3.3a-c Payments to Governments	Conformance	The Entity's Financial Audit Report 2023, issued by a qualified third party, identified that payments to government by the Entity are only those legally required, and there are no other payments. The Entity has disclosed the payments to governments in its 2023 Sustainability Report, page 19: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the Stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from Stakeholders and has an appropriate resolution mechanism. The communication channels (telephone, email) are made public to internal and external Stakeholders and are included in the 2023 Sustainability Report, pages 7-9: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established a Greenhouse Gases (GHG) Inventory Procedure and has a Life Cycle Assessment (LCA) verification statement for one kilogram (1kg) Aluminium foil products. The statement contents include the environmental impact categories in the lifecycle from cradle-to-gate. The LCA Report is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134361.html https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134360.htm !
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	LCA Report is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134361.html https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134360.htm ! Currently, the Entity has not received any customer requests for

CRITERION	RATING	COMMENT
		information regarding its Aluminium-containing Products' cradle-to-gate LCA.
4.2 Product Design	Conformance	The Entity has established the New Product Research and Development Procedure that requires the consideration of materials selection and utilization during the production development and process planning process. This procedure aims to ensure appropriate process selection, improved process efficiency, equipment and load optimization, process optimization, extended service life, convenient maintenance and cost-saving, as well as improving Scrap management and disposal.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a goal of achieving a 100% recycling rate for process waste generated during the production of Aluminium products and regularly evaluates its progress. The Entity has a Scrap and Dross classification and management procedure to classify and dispose of the different kinds of Aluminium scrap. All Scrap is classified and separated by alloy and disposed by different smelters.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Minor Non-Conformance	<p>There is no complete local, regional or national collection and recycling systems for Aluminium Scrap in China. The ESG Manual defines that the Facility shall try to improve the reuse rate of Aluminium. At present, the Entity has signed recycling contracts with customers and scrap material dismantlers to collect the Scrap of Products at End of Life. The Entity monitors the recycling rate in the products and there is a detailed program to improve the reuse rate of Aluminium for products at end-of-life. In 2023, the Entity used 14,704 tonnes of recycled Aluminium.</p> <p>However, the Entity has not implemented a recycling strategy and engaged with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates in their respective markets.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has publicly disclosed Material Greenhouse Gas (GHG) emissions by source annually. Direct and Indirect GHG (categories 1-6) emissions data is included in the GHG Emission Verification Statement, which are verified by an independent body. The GHG Emission Verification Statement is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240823_134260.html</p> <p>However, the quality of the GHG data is low, and there are obvious gaps and contradictions with the data in the GHG Emission Reduction Plan.</p>
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Started production after 2020		
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established GHG emissions reduction targets that are consistent with the commitment to green and low-carbon development and with a 1.5°C warming scenario. The Entity has implemented a GHG Emissions Reduction Plan and publicly disclosed the Plan and a GHG Emissions Reduction Pathway, which has been established using the ASI method: https://zllb.chinalco.com.cn/xwzx/202409/t20240909_135052.html</p> <p>There is a mechanism to review the GHG Emissions Reduction Plan annually and review the Pathway if needed.</p> <p>However, the input value of Primary Aluminium emission intensity is high (9.5 tonnes), which uses the industry average data and fails to reflect the actual level of the Entity.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established an Energy Management System Manual and GHG Inventory Procedure, which defines the GHG emissions control measures and annual analysis of GHG emissions according to the ISO 14064-1:2018 standard to achieve performance aligned with the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>Implementing the Environment Management System and legal requirements, the Entity has identified, assessed and quantified Material Emissions to Air from its activities, implemented control plans and monitored the effectiveness of the control plans periodically and reviewed the control plans regularly and in the case of any Major Changes or non-conformance. The Entity has publicly disclosed its environmental performance, pollutant discharge information and the operation status of air emission control in its Sustainability Report, Chapter 6 Environmental Management: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html</p> <p>However, the Entity does not quantify the emission data and the latest test results of air pollutants, and does not disclose the emission reduction plan of air pollutants in the Sustainability Report.</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>In accordance with the approved Environmental Impact Assessment (EIA) report and Pollutant Discharge Permit, all industrial wastewater is 100% recycled, with no discharge to external drainage/water systems. The Entity collects, treats and recycles wastewater. The quarterly monitoring results indicate the water quality meets the required recycling water standards. As per the monitoring results of surrounding soils, surface water and underground water, no pollutants were identified.</p> <p>However, the Entity does not quantify the emission data and the latest test results of wastewater pollutants, and does not disclose the</p>

CRITERION	RATING	COMMENT
		emission reduction plan of wastewater pollutants in the Sustainability Report.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	An assessment of risk areas of operations where Spills and Leakages may contaminate air, water and soil has been undertaken following the risk assessment process of the Environmental Management System. The relevant management plan has been established and implemented. The Entity reviews the plans periodically and if needed after a Spill or Leakage event or Major Change in the business. The latest version of the Emergency Plan for Environmental Incidents is disclosed on the website: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240824_134261.html
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable as there have been no incidents of Spills or Leakages. However, the Environmental Impact Assessment Report assesses the potential impact of Material Spills and Leakages as soon as practicable after an incident.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	Waste management is addressed in the Environmental Management System. The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity has mitigated Material impacts by re-using and recycling wastes. The disposal of Hazardous Waste and solid Waste complies with applicable legal requirements. However, the Entity does not disclose the amount of Hazardous Waste and Non-Hazardous Waste generated and disposed in the Sustainability Report.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	In accordance with applicable legal requirements on Hazardous Waste, Dross is collected, labelled, stored and transferred to licensed suppliers for disposal. No leakage has been observed and/or reported. The licensed supplier processes the Dross to maximize the recovery of Aluminium through the treatment of Dross and Dross residues, and the recycling of treated Dross residues. There is no landfilling of Dross residues.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and documented water withdrawal and use by source and type in the EIA. The Entity has assessed the water-related risks, which considered the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures. The risk was identified as low, there are no Material water-related risks in the Entity's Area of Influence. The Assessment Report of Water-Related Risks is accessible on the Entity's website: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132605.html
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as there are no Material water-related risks in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Biodiversity and Ecosystem Services Risk and Impact Assessments are included in the Entity's Environmental Impact Assessment (EIA), conducted by qualified Third Parties approved by the local Environmental Protection Agency. As per the approved EIA reports, there are no Biodiversity-sensitive areas in the Entity's Area of Influence. The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The risks and potential impacts on Biodiversity and Ecosystem Services have been assessed as low. The Biodiversity Assessment Report for the Entity is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134362.html
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented as low. No Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has identified the risks of the introduction of Alien Species during operation and transportation activities and assessed whether the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The risk was identified as low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to not exploring or developing New Projects in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an Industrial Park with no Protected Areas present.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	The Entity has established a Code of Conduct to respect Human Rights, which is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html The Entity has established a procedure to conduct a Human Rights Due Diligence process. Implementation of the Human Rights Policy and relevant performance are reviewed. The Human Rights Impact Report and information on the Affected Communities' engagement approach and the Complaints Resolution Mechanism are publicly

CRITERION	RATING	COMMENT
		<p>disclosed: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140432.html</p> <p>The Entity has identified the Affected Populations and Organisations as Stakeholders, and complaints channels are public to all Stakeholders, as provided in the 2023 Sustainability Report: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html</p> <p>No adverse impact has been reported and so no remedy is required.</p> <p>However, the Human Rights Due Diligence did not include one on-site service provider.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity commits itself in its Code of Conduct to protect female Workers and respect and promote gender equity and women's empowerment within the Chinalco Group. The Entity respects for the rights and interests of women and develops activities to support work-life balance, especially for women.</p> <p>The Entity has publicly disclosed information on the gender equity Policy and performance on the protection of female Workers: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140441.html</p> <p>Female Workers' remuneration is equivalent to male Workers, each department and management team have female Workers, and no Discrimination is noted. Relevant information is disclosed in the 2023 Sustainability Report, page 16: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html</p>
9.3a-l Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity, as per the assessment report, there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has established and implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples.</p>
9.4a Free, Prior, and Informed Consent (FPIC)-- New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity, as per the assessment report, there are no Indigenous Peoples within the Entity's Area of Influence. Additionally, there have been no New Projects developed since 2020. However, the Entity has established and implemented Stakeholder engagement processes to manage communication with the Local Communities to obtain their major concerns on the impact of New Projects or existing operations on Local Communities.</p>
9.4b Free, Prior, and Informed Consent (FPIC)-- Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC)-- Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence and therefore Free, Prior and Informed Consent (FPIC) has not been required.</p>
9.5a Cultural and Sacred Heritage-- Identification	Conformance	<p>The Entity has established and implemented a procedure to identify cultural and sacred heritage and conduct risk assessments to reduce the impact on any sites. At present, all of the Entity's projects have undergone an EIA and social stability assessment, and it has been determined that there are no sacred or cultural heritage sites within the project's impact area.</p>

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites within the Entity's Area of Influence. However, the Entity has implemented a procedure to identify the cultural and sacred heritage and conduct risk assessments to reduce the impact on the sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Changes or New Projects causing resettlements in the history of the Entity. Additionally, there have been no New Projects since the Entity joined ASI in 2020.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established and implemented a Stakeholder engagement process to identify the major concerns of Affected Populations and Organisations. The Entity has developed various plans to respond to the major concerns of the Affected Populations and Organisations. The implementation and progress of the plans are reviewed annually, relevant improvement actions are undertaken, and the Entity's actions and performance against the plans are publicly disclosed at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140432.html
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a Supplier Code of Conduct and through its Management System is committed to not using conflict minerals. Training has been provided for all relevant employees. The Entity's ASI Policy, including the Purchasing Policy and requirements are communicated to suppliers and made publicly available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140429.html and https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has identified and assessed the risks in its supply chain through regular risk assessment and Due Diligence processes. No conflict minerals are used, no sourced materials are from Conflict-Affected and High-Risk Areas, and there are no critical Human Rights issues such as Child Labour and Forced Labour.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as per the risk assessment record, no conflict minerals are used, no materials are from Conflict-Affected and High-Risk Areas, and there are no critical Human Rights issues such as Child Labour and Forced Labour.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Performance Standard Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established and implemented a supplier Code of Conduct, performed a risk assessment and undertaken a social responsibility audit on its supply chain. The Entity commits that no conflict material will be used in its supply chain. There is no conflict minerals used, and no materials are from Conflict-Affected and High-Risk Areas. The Entity has disclosed its policy/commitment to not use conflict materials in its 2023 Sustainability Report, page 17: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html However, the Entity's practice on its supply chain Due Diligence is not publicly disclosed.

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9.9 Security practice	Conformance	The security at the Entity is provided by the parent company (Yunnan Aluminum Co., Ltd). The Entity has established regulations to address the code of conduct of security personnel and ensure respect for Human Rights. There have been no violations of Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union, and all Workers are members. The Labour Union Constitution outlines the Union representatives' election process and member's rights.
10.2a-c Child Labour	Conformance	The Entity has established processes to ensure no Child Labour is employed. Document review, site observations and Worker interviews during the Audit confirmed that there is no Child Labour or young Workers at the Entity. The youngest Worker in the Entity was 20 years old.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy on the prohibition of Forced Labour including Human Trafficking. The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. No case of illegal wage deductions, Debt Bondage, payment for a debt or other type of Forced Labour has been identified nor reported in the Entity. The Entity has disclosed its Modern Slavery Statement, available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140433.html
10.4a-c Non-Discrimination	Conformance	The Entity's ASI Management Manual and Non-Discrimination Management Procedure address the requirements on anti-Discrimination, including during hiring, promoting, and training processes. The Entity has implemented adequate and effective processes to ensure there is no Discrimination, for example, no sensitive health check items such as pregnancy test is required upon hiring, women are employed from direct Workers to senior management team, Workers with disabilities are hired, no discriminatory conditions in recruitment advertisements, fair promotion program based on skill and capability, equal chance for Overtime work, and the same benefits are received for the same position. There have been no complaints on Discrimination received by the Entity. The Entity has disclosed its performance on gender equity at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140441.html
10.5 Communication and engagement	Conformance	The Entity encourages Workers to participate in the ASI Management System, and direct and frequent communication with Workers and the representatives of the Workers' Council is established. Interviewed Workers provided feedback on a positive working environment and direct communication.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies stating that Harassment and bullying are not accepted. An information brochure has been developed and distributed to all employees. The Entity's ASI Policy is

CRITERION	RATING	COMMENT
		clear on this issue and regular training of employees is performed. The ASI Policy is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140427.html
10.7a-d Remuneration	Conformance	The Entity and Workers sign labour contracts within a month of commencing employment at the Entity. The terms and conditions of the labour contract meet the labour contract law. The wage structure is clearly defined; and the basic wage is not less than the legal minimum wage. The total payment meets the Workers' basic needs. Overtime is paid in accordance with the legal requirements of 150% of the regular wage for Overtime on working days, 200% for weekends, and 300% on public holidays. All the employees are enrolled in the social insurance and housing fund. Moreover, the Entity has provided supplemental retirement insurance to all Workers, which is leading practice in China. Wages are paid to Workers monthly, without delay.
10.8a-c Working Time	Minor Non-Conformance	Working hours at the Entity are recorded and tracked. The regular working hours are 8 hours a day, 5 days a week, with a total of 40 hours a week. Working hours are monitored and controlled, and do not exceed the legal limit. All Workers having an average of one day off per seven-day period and the Workers' daily working hours do not exceeded 8 hours. The Entity has an established procedure on providing annual leave to Workers, however, the Audit identified isolated violations of the provision of annual leave.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed employees of their rights during the signing of their employment contract, and contracts terms are detailed in the employee handbook and communicated to Workers through orientation training. The Entity's ASI Management Manual and social accountability procedure training, which is provided to all employees, addresses lawful Freedom of Association. The key information is also posted in workshops on billboards.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System, including a management manual and procedural documents (Certificate Number: 00119S32000R0L/5300, Issue Body: CQC, Valid Date: from 10 October 2022 to 11 September 2025). The Management System is internally audited and reviewed annually. The Management System addresses the requirements for non-compliances, including analysis of the root cause and implementation of corrective and preventative actions. The latest external audit of the Entity's OH&S Management System identified no major non-conformances raised. As per site observation, document review and management and Worker interviews, the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	The Entity has regularly reviewed the OH&S Management System, including during monthly safety meetings, annual legal compliance evaluations, annual internal audits against ISO 45001:2018, and the management review meeting. When any indication of a control gap is shown, the review is conducted to assess if the potential corrective and/or preventive actions should be implemented.

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		The achievement of OH&S objectives/targets in 2023 and the comparative analyses of performance with peer businesses and leading practice published in the 2023 Sustainability Report, Chapter 7 Social performance: https://zllb.chinalco.com.cn/xwzx/gsyw/202407/t20240719_132603.html
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a system of Workers' Consultation and participation in OH&S. The Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Worker representative, and management responds to the concerns and advice.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 July 2021	Initial Certification Audit – Full Certification
1	16 May 2023	Surveillance Audit
2	14 January 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3. Update to Member and Entity Name following the company name change from Yunnan Haoxin Aluminum Foil Co., Ltd.