

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Shanghai Sunho Aluminum Foil Co., Ltd

CERTIFICATE NUMBER
19

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
28 FEBRUARY 2025

DATE OF EXPIRY
27 FEBRUARY 2028

CERTIFIED SINCE
28 FEBRUARY 2019

AUTHORISED BY

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

Manufacture of Aluminium and
Aluminium alloy foils at Shanghai
Sunho Aluminum Foil Co., Ltd.
located in Shanghai, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	Shanghai Sunho Aluminum Foil Co., Ltd
CERTIFICATION SCOPE	Manufacture of Aluminium and Aluminium alloy foils at Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">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)Re-Certification Audit and Scope Change (23 – 24 October 2024)
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)23 – 24 October 2024 (Re-Certification Audit and Scope Change)
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)12 December 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Certification Audit (21 – 25 January 2019)</u></p> <p>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> <p><u>Surveillance Audit (15 – 17 September 2020)</u></p>

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.

Re-Certification Audit and Scope Change (23 – 24 October 2024)

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

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 2025 – 27 February 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

27 August 2026

CERTIFICATE NUMBER

19



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

Shanghai Sunho Aluminum Foil Co., Ltd (the 'Entity') is a wholly owned subsidiary of Henan Sunho Group Co., Ltd (SZ.000933) and was established in March 2004. It is located in the Shanghai Pudong Kangqiao Industrial Zone, near the intersection of Shenjiang South Road and Xiuyan Road, and covers an area of 368 mu (24.5 hectares), 12 kilometres from Pudong International Airport and adjacent to Shanghai Disneyland.

The Entity is a precision Aluminium foil processing, manufacturing and service supplier based in China. They produce a wide range of Products with thicknesses ranging from 0.060mm to 0.0045mm. Their Products are widely used in the packaging of food, beverage, cigarettes, medicine and cream products, as well as in thermal insulation materials, video cables and various other industries. Their Products meet upscale capacitor foil quality and technical index requirements.

The main production equipment includes three 2,150mm wide foil mills, three separators and one doubler, and a work roll grinding machine.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has a system in place to identify and assess the applicable legal requirements, 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. According to the register of misconduct, there are no reported Corruption cases in the past three years.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles related to environmental, social and governance performance. The Entity has implemented control measures, including training, communication to raise awareness of the Code among business partners and suppliers.</p> <p>The Code of Conduct is reviewed during the annual management review meeting, or when there is a major change in the Entity or there are control gaps. The Code is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3250</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity's Policies are consistent with the environmental, social, and governance practices included in the ASI Performance Standard. The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies are reviewed in the annual management review meeting, or when there is a major change in the Entity or control gaps.</p> <p>The Policies are available for internal Stakeholders through training and display on-site, and is available for external Stakeholders via the website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2841</p>
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated. The responsibility and authorities to establish, implement, maintain and continually improve the ASI Management System are clearly defined.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems - Social	Conformance	A Social Management System has been established and implemented. Social impacts and relevant risks including risks related to Human Rights, Occupational Health and Safety, and business ethics are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that address responsible sourcing. The Entity conducts second party Due Diligence audits at major next-tier suppliers' sites to qualify them. The procurement team and relevant

CRITERION	RATING	COMMENT
		<p>personnel are trained on responsible sourcing requirements on an annual basis. The Entity's Due Diligence Procurement Policy was reviewed and revised in December 2022 and is publicly available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016</p> <p>According to the Entity's ASI management procedure, the Policy is reviewed during the annual management review meeting, or when there are any changes to the business that bring about significant impacts regarding environmental, social and governance risks, or when there are indications of control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the last three years. Nonetheless, the Entity has environmental and social Management Systems, and environmental aspects, health and safety risks and control plans are reviewed annually. According to the Entity's ASI management procedures, the Entity commits to review the environmental and social impact management plan at least every five years, or when there are changes or signs of any control gaps.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the last three years.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates, and Emergency Response Plans are developed and implemented. The Entity conducts annual emergency response drills to assess the effectiveness of the plans and provides emergency response training to employees.</p> <p>The Entity commits to review of the Emergency Response Plans in the event of any changes that result in a modification of the nature and scale of emergency risk or when there are indications of control deficiencies.</p> <p>The Emergency Response Plans are publicly available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3755</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a plan for business continuity and disaster resumption, which addresses the control measures to prevent, or mitigate adverse social, environmental and governance impacts caused by suspension or significant operation change caused by situations out of its control. It is defined within the plan that review a shall be undertaken at least every five years, or when there is a major change in the Entity, or when a control gap identified. There has been no such event in the past three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions, however, no such activity has occurred since the commencement of operations in 2004.
2.10a-b 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 in 2004.

3. TRANSPARENCY

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its annual 2023 Sustainability Report, available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p> <p>The report is written in the company format and has not been verified by a Third Party.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>Information on legal compliance and other relevant details are disclosed in the Entity's Sustainability Reports. The content pertaining to legal compliances and liabilities was verified on relevant Government websites during the Audit. The 2023 Sustainability Report is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p>
3.3a-c Payments to Governments	Minor Non-Conformance	<p>Payments to Government are included in the Entity's Finance Report, which is audited by a third party. All payments are made in accordance with all legal requirements.</p> <p>However, the information is not publicly disclosed.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>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. The whistleblowing/complaint channels are publicly disclosed in the 2023 Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted an environmental Life Cycle Assessment (LCA) that includes all its Aluminium Products and Product lines.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The LCA report can be provided upon request by Stakeholders. There have been no requests to date. The Entity has defined how to communicate with customers in relevant management procedures. The summary of the LCA report is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3772</p>
4.2 Product Design	Conformance	<p>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.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>Aluminium Process Scrap is collected, packaged, and sold to a smelter or manufacturers of construction materials for recycling, which has achieved a recycling rate of 100%. The Entity does not separate and sort process foil Scrap due to the minimal differences in alloy composition.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>Management interviews during the Audit confirmed that the Entity is not directly involved in the collection and reuse of Post-Consumer Scrap at the End of Life. However, the Entity, as part of the Sunho Group, works with a brother company Shangqiu Yangguang Aluminium Product Co., Ltd. to implement a recycling strategy. This company is primarily responsible for establishing the specific timelines, activities and targets, and publicly discloses the strategy at:</p>

CRITERION	RATING	COMMENT
		http://www.shalfoil.com/NewsDetail.aspx?ID=3376
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity works in partnership with their brother company, Shangqiu Yangguang Aluminium Product Co., Ltd. to collaborate with the customer to determine how to improve the recycling rate of Products at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>In accordance with the ISO 14064 standard, the Entity has conducted an inventory of its Greenhouse Gas (GHG) emissions at the organisational level and has engaged a Third Party to verify the relevant emissions data. The Entity's GHG Inventory Report defines the Entity's 2023 total emissions as 635,132 tonnes of CO₂e, comprising 23.15 t CO₂e Scope 1 direct emissions, 13,696 t CO₂e Scope 2 energy consumption, and 610,308 t CO₂e Scope 3 Category 1 (Purchased Goods and Services). The GHG Inventory Report is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3760</p> <p>An independent Third Party has conducted a verification of the Entity's 2023 GHG Inventory Report, available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3759</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan, which aims to control the CO₂ emissions intensity of its Products from 'cradle-to-gate' below 15.5 tonnes CO₂e/t by 2026. To achieve these emissions reduction strategies, the Entity has implemented or plans to implement a series of technological and managerial measures to minimise GHG emissions throughout its supply chain and production processes. In addition to general measures such as improving energy efficiency and optimising processes to reduce energy consumption and rooftop solar photovoltaic panels to reduce office power consumption, the Entity's main strategy involves the procurement of 'low- CPF (Carbon Footprint)' raw materials (such as electrolytic Aluminium) to lower the carbon emission intensity of its Products.</p> <p>The Entity has used the ASI GHG Calculation Tool and the reduction targets included in the GHG Emissions Reduction Plan are in line with the requirements for a 1.5°C warming scenario.</p> <p>The Entity has publicly disclosed its GHG Emissions Targets and Implementation Plan: http://www.shalfoil.com/NewsDetail.aspx?ID=3761</p> <p>The Entity has committed to review the progress of the GHG Emissions Reduction and Implementation Plan annually and disclose updates and improvement measures related to the plan.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity's GHG Emission Reduction Plan defines the management approaches for GHG emission reductions, with a primary focus on energy management. On-site observations, document review and interviews conducted during the Audit confirmed that the Entity follows a 'Plan-Do-Check-Action' approach, manages its energy consumption, and monitors the Management System performance to achieve its GHG Emission Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity's main sources of air pollution are Non-Methane Hydrocarbon (NMHC) and oil fog emissions. The Entity has developed a plan to reduce these pollutants and has established an Air Emissions Management Program, which involves regular upkeep of air pollution control facilities and frequent checks of exhaust emissions. The Entity has a process to review its air emissions management plan regularly and whenever there are serious risks present. Annual air pollutant monitoring reports confirm the Entity is in compliance with regulatory requirements. The Entity's 2023 Emissions Data and Reduction Plan is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3762
6.2a-g Discharges to Water	Conformance	The Entity only carries out Aluminium foil rolling processes, which does not produce any process wastewater during manufacturing. Based on the evaluation of water resources and annual monitoring of domestic wastewater discharge, the Entity's use of domestic water has a very low impact on water resources and the environment. The Entity has committed to a regular review of the relevant water pollutant management plan and to address any control deficiencies that arise.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established a procedure for assessing and managing the risks of Spills and Leakages, and has prepared appropriate emergency response actions and plans, which are available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3755 The Entity has performed regular checks to detect any possible sources of Spills and Leakages. The Entity is committed to review and update their emergency response and Spills and Leakages prevention management plans whenever there are any changes that may affect the risks associated with Spills and Leakages, or when there are indications of control deficiencies.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and Leakages is defined in the Entity's environmental protection management procedure and the Emergency Response Plans. There have been no recorded incidents of Spills since the last ASI Audit. The latest version of the Spills and Leakages risk assessment report and the Emergency Response Plan are publicly available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3755
6.5a-c Waste Management and Reporting	Conformance	Waste management is addressed in the Entity's Environmental Management System and is implemented in accordance with the Waste Mitigation Hierarchy. The Entity mitigates its Material impacts by reusing and recycling waste. The disposal of Hazardous Waste is in compliance with the applicable legal requirements. The Entity has publicly disclosed its Hazardous and Non-Hazardous Waste data for 2023 in the Hazardous Waste Management Plan, available at:

CRITERION	RATING	COMMENT
		http://www.shalfoil.com/NewsDetail.aspx?ID=3765
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has determined and documented its water intake and usage based on the source and type in the environmental impact and water resource risk assessments. The Entity has assessed the water-related risks, taking into account the surrounding water environment, water intake and discharge, as well as the effectiveness of existing management measures. The Entity's water resource risk is considered low, and there are no significant water-related risks within the Entity's Area of influence.</p> <p>The Entity has disclosed a Water Resources Risk Assessment Report, including a water balance diagram, available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3767</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment and Water Resources Risk Assessment reports confirm that the Entity's water resource risk is considered low, and there are no significant water-related risks within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>A qualified Third Party has conducted a Biodiversity and Ecosystem Services assessment as part of the Environmental Impact Assessment (EIA), which has been approved by the local environmental protection agency. The Entity is located within an industrial zone. The EIA confirmed that the Entity's Area of Influence does not include any Biodiversity sensitive areas, and the risk level is deemed low. The Biodiversity Assessment Report is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3768</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented in the EIA report as low, and no Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented in the EIA report as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented in the EIA report as low, and no Priority Ecosystem Services have been identified.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity has implemented a management Policy and procedures designed to prevent the introduction of Alien Species. The potential risks associated with introducing such species through its operations and logistics activities have been identified. An assessment to determine if these activities could significantly harm Biodiversity concluded that the risk of introducing Alien Species from the Entity's operational activities is extremely low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has defined a commitment within its ASI Management Manual to not explore or develop New Projects in World Heritage Properties. There are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as the EIA Report, approved by the local environment protection agency, confirmed that there are no Protected Areas within the Entity's Area of Influence. Regardless, the Entity has defined a commitment within its ASI Management Manual regarding Protected Areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Social and Environmental Governance Policy with the commitment to respect Human Rights, and has communicated the Policy to all employees: http://www.shalfoil.com/NewsDetail.aspx?ID=2841</p> <p>The Entity commits to respect Human Rights and extends this commitment in the supply chain. The Entity has implemented a Human Rights Due Diligence process that addresses its supply chain, including employment (labour) agencies and sub-Contractors.</p> <p>The Entity has established a complaints/grievance channel for Stakeholders. There have been no reported cases where the Entity has caused or contributed to Human Rights impacts.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity respects women's legal rights and interests and has established and implemented a program on gender equity. The program is reviewed during the annual management review meeting or when there is a major change or control gap.</p> <p>There have been no complaints received from women Workers. The measures taken to promote gender equity and their effectiveness are publicly disclosed in the 2023 Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) -	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
New Projects or Major Changes		
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has consulted with the local government agencies and identified that there are no sacred or cultural heritage sites or values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no activities that would require resettlement or cause displacement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity is located within an industrial area and the surrounding Communities are managed by the local government. The interaction between the Entity and the Communities is limited.</p> <p>The Entity respects the rights and interests of Local Communities. The impact on Affected Populations and Organisations is the potential environmental pollution from the Entity's operations and the Entity has established an Environmental Management System to mitigate the impacts. The Entity's environmental management plan and performance are publicly disclosed in the 2023 Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established and implemented comprehensive Management Systems, which encompass a supply chain Policy, clearly defined responsibilities and allocated resources, information gathering mechanisms, and active engagement with suppliers. The Entity's commitment to responsible sourcing is disclosed in the Responsible Aluminium Sourcing and Due Diligence Policy, which includes details on the grievance channel, available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3753</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted regular risk assessments to identify and evaluate potential risks within its supply chain. The Entity's major suppliers are ASI Certified Entities, and the Entity does not use conflict minerals and ensures that no material is sourced from Conflict-Affected and High-Risk Areas (CAHRAs). Furthermore, the Entity is committed to addressing critical Human Rights issues and ensures Child Labour and Forced Labour are not present within its supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment determined that the Entity does not use conflict minerals, source materials from CAHRAs, or have any critical Human Rights issues in its supply chain.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted an annual review through internal audits to evaluate the efficacy of its Due Diligence investigations within its supply chain. The Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has successfully implemented the ASI Code of Conduct throughout its supply chain and conducted risk assessments and social responsibility audits to ensure compliance. However, the Entity currently does not publicly disclose information and performance-related information on the topic of conflict materials.
9.9 Security practice	Conformance	The Entity has established and implemented security practices that respect Human Rights. The responsibilities and authorities are clearly defined in the security agreement and security staff undergo relevant training on Human Rights. No complaint or grievance regarding security staff or practices has been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Applicable Law in China regarding Freedom of Association and the right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has committed to respecting Workers' rights. There are 54 elected Worker representatives including eight women, and a Labour Union has been established in accordance with legal requirements. The Entity respects Workers' rights to Collective Bargaining, however, there are no Collective Bargaining Agreements in place.
10.2a Child Labour	Conformance	Based on the review of records and management and Worker interviews, the Entity does not use or support the use of Child Labour or young Workers. 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 the local legal requirements.
10.3a-c Forced Labour	Conformance	The Entity has implemented a management procedure on the prohibition of Forced Labour, slavery and Human Trafficking, and requires its suppliers to do the same. Workers are not required to provide any form of Deposit, Recruitment Fee or equipment advance. The Entity does not provide loans to Workers and there are no restrictions on Workers' movements. The Entity does not retain Workers' original documents, only copies are kept in personnel files. The notice period for termination of employment is in compliance with the Labour Contract Law: 30 days in advance or three days during the probation period. The Entity has publicly disclosed its annual Modern Slavery and Human Trafficking Statement at: http://www.shalfoil.com/NewsDetail.aspx?ID=3770
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination, and it has clearly defined that any form of Discrimination is not tolerated. Decisions in hiring, employment (such as compensation, promotion, access to

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		training), or terminations are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics. There have been no instances of Discrimination received.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and the Workers' representatives. This communication is efficient, as evidenced by the Labour Union Committee meeting minutes and interviews with Workers and management.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented the ASI Environmental, Social, and Governance (ESG) Policy, which addresses the prohibition of Violence and Harassment, and respects its employees, ensuring the prohibition of any kind of inhumane actions, Harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation. With the participation of Workers, the Entity has identified and assessed the risk of Violence and Harassment and implemented measures to prevent or control the risks. The Entity's ASI ESG Policy is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=2813
10.7a-c Remuneration	Conformance	The Entity's wage structure is clearly defined, and the basic wage exceeds the legal minimum wage. The total payment meets Workers' basic needs. All payments to Workers are documented and made promptly via bank transfer on the 15 th of the following month. Payslips are digitally provided to Workers and include all necessary information.
10.8a-c Working Time	Conformance	Working hours are recorded manually. Working hours are monitored to ensure that the total does not exceed 60 hours per week and that the total working hours over three months do not exceed the legal limit of 608 hours per quarter (as the Entity has approval for implementing the comprehensive working hour system).
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed Workers of their rights during orientation/onboarding and through regular training and the provision of the Employee Handbook.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has developed and implemented comprehensive Policies and control procedures for Occupational Health and Safety (OH&S) in compliance with ISO 45001:2018 and relevant legislation. It has conducted a thorough risk assessment, and according to the latest Occupational Hazard Factor Identification Report, the Entity's occupational hazard factors meet the legal standards, except for occasional excessive noise at certain workstations. Utilising the PDCA (Plan-Do-Check-Act) cycle, the Entity regularly reviews the performance of its OH&S Management System. It also maintains detailed records of control, monitoring, and review activities to demonstrate the effectiveness of the health and safety Management System.
11.1b-e Occupational Health and Safety (OH&S)	Conformance	The Entity has conducted periodic reviews of its OH&S Management System through various methods, including monthly safety meetings, an annual evaluation of legal compliance, annual internal audits, and

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Management System - Reviews and disclosure		<p>management review meetings. Should any sign of a control gap emerge during these evaluations, a comprehensive analysis is undertaken to determine the necessity for implementing corrective and/or preventive actions.</p> <p>To Entity has published its OH&S performance data, including objectives and targets for 2023, as well as comparative analyses of performance with peer businesses and leading practices. The data is available in the 2023 Sustainability Report: http://www.shalfoil.com/NewsDetail.aspx?ID=3632</p>
11.2 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.

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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.
5	20 February 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply PS V3, including the revised title for the Material Conversion supply chain activity; Adjusted Certification Scope wording to improve legibility.