

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Jiangsu Dare Aluminum Industry Co.,Ltd.

CERTIFICATE NUMBER  
**443**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3 2022)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**SHANGHAI KYLIN  
CERTIFICATION SERVICE  
CO., LTD.**

DATE OF ISSUE  
**31 MARCH 2025**

DATE OF EXPIRY  
**30 MARCH 2028**

CERTIFIED SINCE  
**31 MARCH 2025**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'Jh' followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

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

## CERTIFICATION SCOPE

Manufacture of Aluminium foil with  
main processes including rough  
rolling, middle rolling, coiling,  
finishing rolling, cutting, annealing  
and packaging at Jiangsu Dare  
Aluminum Industry Co., Ltd., Jiangsu  
Province, China.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Jiangsu Dare Aluminum Industry Co.,Ltd
ENTITY NAME	Jiangsu Dare Aluminum Industry Co.,Ltd.
CERTIFICATION SCOPE	Manufacture of Aluminium foil with main processes including rough rolling, middle rolling, coiling, finishing rolling, cutting, annealing and packaging at Jiangsu Dare Aluminum Industry Co., Ltd., Jiangsu Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	Shanghai Kylin Certification Service Co., Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>11 – 12 November 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>27 January 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium foil with main processes including rough rolling, middle rolling, coiling, finishing rolling, cutting, annealing and packaging at Jiangsu Dare Aluminum Industry Co., Ltd., Jiangsu Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Semi-Fabrication</li><li>Material Conversion</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> 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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>

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CERTIFICATION PERIOD	31 March 2025 – 30 March 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	30 September 2026
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CERTIFICATE NUMBER	443
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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.

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## ENTITY OVERVIEW

Jiangsu Dare Aluminum Industry Co.,Ltd. (the 'Entity') was established in 1993 and serves as the backbone of Dare Technology Co., Ltd. The Entity is situated in the Dare Industrial Park within the Danyang City Economic Development Zone, covering an area of 133 acres. It is recognised as one of the first enterprises in China to produce Aluminium foil, having imported advanced equipment from abroad for this purpose.

The main production machinery was sourced from Germany and the UK and features an advanced automatic control system, enabling an annual output of 20,000 tonnes of Aluminium foil. The Entity's leading products include battery Aluminium foil, power capacitor Aluminium foil, and various types of packaging Aluminium foil produced for the building, automotive and packaging sectors.

The Entity, with over 30 years of experience, has specialised in the research, development, and production of Aluminium foil. It is well-regarded as a leading domestic Aluminium foil enterprise and has been recognised as a national high-tech enterprise. It holds numerous invention patents and has received several national awards for product quality and brand excellence.

## 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	Low	Medium	Low	LOW
OVERALL	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has established a Regulatory Control Procedure. The EHS department is responsible for safety and environmental protection regulations, while the Human Resources department is responsible for collating regulations and conducting Compliance evaluations for labour and business ethics. The Entity maintains a list of regulations, which addresses EHS, labour, ethics and others. The Entity has identified applicable regulations and maintains Compliance evaluation records. The Entity also provided records for their Environmental Impact Assessment, safety assessment, fire safety inspection, and property certification.
1.2 Anti-Corruption	Conformance	<p>The Entity's ASI Code of Conduct is opposed to all forms of Corruption. The Entity has established the Prohibition of Corruption and Bribery Management Procedure, and the ASI Management Representative is responsible for all issues. The Entity has maintained training records regarding Business Ethics and anti-Corruption by various departments.</p> <p>The Entity's Complaints and Reporting Management Measures, which is publicly available, makes available the relevant phone numbers and email addresses to report a complaint. Suggestion boxes are placed in office buildings and workshops. The Entity requires managers and purchasing and sales staff to sign the 'Employee Integrity and Self-discipline Commitment Letter'. The Entity provided evidence of signed commitment letters from various managers and staff at the Audit.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established an ASI Code of Conduct, which addresses governance, environmental, and social aspects. The 'Policy, Objectives and Management Plan Control Procedure' stipulates that the Code of Conduct must be re-evaluated annually or when proposed by the department. The Code of Conduct is available at:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented management Policies and the 'Policy, Objectives and Management Plan Control Procedure'. The procedure stipulates the Entity should evaluate the Policy and its objectives annually or as needed. The Policy includes environmental, social and governance (ESG), resource provision, and quality requirements, and was approved by the General Manager. The Policy is posted in the workshops and check-in areas. The Policy is available at:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
2.2a-c Leadership	Conformance	The Entity has appointed the Assistant General Manager as the ASI Manager Representative. The appointment letter states that the Management Representative is responsible for implementing the ASI Code of Conduct, improving ESG performance, providing necessary resources, and for internal and external liaison in ASI-related affairs.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established an Environmental Management System and developed and implemented multiple environmental management procedures. The Entity has obtained an ISO 14001 certificate.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an ISO 45001 certified Occupational Health and Safety Management System. The Entity has also established procedures related to the Social Management System including procedures covering labour and Human Rights.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has established management Policies, including responsible procurement Policies, which are publicly disclosed. The 'Policy Objectives and Management Plan Control Procedure' requires annual evaluation or re-evaluation when there are defects. The 'Supplier Code of Conduct Notice' is issued to and signed by the Entity's main suppliers.</p> <p>However, the Entity provided a Due Diligence report for only one of its major Aluminium suppliers during the Audit and reports were not available and for other suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.</p> <p>However, the Entity has established the Construction Project Control Procedure to manage new construction or renovations. The EHS department must conduct an Environmental and Social Impact Assessment.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.</p> <p>However, the Entity has established the Construction Project Control Procedure to manage new construction or renovations, the EHS department needs to conduct an Environmental and Social Impact Assessment. The Human Resources department must conduct a Labour Impact Assessment.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established an Environmental Emergency Response Plan submitted to the Environmental Protection Bureau. It includes plans for atmospheric, water, sudden environmental events, fires, explosions, etc. The Entity has also established an 'Emergency Plan for Production Safety Accidents' for a specialised and comprehensive safety team. The Entity has an emergency rescue project team and conducts one or more emergency drills annually. The environmental and safety plan is available at:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established an 'Emergency Preparedness and Response Control Procedure' to respond to potential environmental and safety impacts in the event of a fire, explosion, or natural disaster. If necessary, corrective actions must be taken in accordance with the 'Corrective Action Control Procedure'.</p> <p>The Entity has an emergency plan for production response measures for emergency events such as equipment, raw materials, disasters, and accidents. If there are any issues, management, and Human Resources will provide employee support and transfers to other departments within the group to maintain their salary level or assist in recommending other work.</p>

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Mergers and Acquisitions Process Control Procedure, which requires Due Diligence on ESG issues during the merger and acquisition process as they arise.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established the Closure, Retirement and Divestment Procedure, which requires the Entity to consider ESG factors, consult with Stakeholders, and consider the impact on Workers and affected communities during the closure and retirement phases. Where necessary, the Entity will provide financial support for environmental rehabilitation.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has produced a Sustainable Development Report for 2023, which outlines its ESG Policies, environmental performance, health and safety performance and social performance, available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity stated in the Sustainable Development Report that it had received no violations or penalties. It was confirmed that there is no record of non-compliance on the government's enterprise information website: <a href="https://www.gsxt.gov.cn/index.html">https://www.gsxt.gov.cn/index.html</a>
3.3a-c Payments to Governments	Conformance	The Entity has disclosed payment information to the government in the Sustainable Development Report. In 2023, the Entity did not make any additional payments except for taxes and fees. The Entity provided accounting statements for the year 2023, which are consistent with the Sustainable Development Report, page 2: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established the 'Complaint and Reporting Management Procedure' which specifies the department responsible for handling complaints and suggestions from employees or other relevant parties. The Entity also has an employee suggestions box, which is responsible for collecting employee opinions from the administrative office.</p> <p>The Entity provided statistics on employee communication and the solutions provided. The internal and external complaint phone and email addresses are publicly disclosed in the Sustainable Development Report, page 8: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) based on one tonne of Aluminium foil. The LCA report includes climate impacts, acidification, ocean eutrophication and other related issues.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The LCA is based on 'cradle-to-gate' data, including system boundaries, databases and other basic information. The LCA Report is available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, the Greenhouse Gases (GHG) information included in the LCA Report was found to be inaccurate.</p>

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	The Entity's Technology Development Department seeks to improve raw material yields by reducing head and tail waste and improving product qualification rates and statistics every month. The Technology Department develops cost and consumption saving measures and tracks their implementation.
4.3a-b Aluminium Process Scrap	Conformance	The Entity uses pure Aluminium as raw material without grades. The current yield rate is approximately 86%, which is continuously improved upon through process improvement. The Entity has set a target of 100% recycling of scrap Aluminium, the majority of Aluminium waste is sold to external Aluminium users, and a small amount is sold to brick companies as additive material. The Entity is exploring selling 100% scrap Aluminium to Aluminium recycling companies in future.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has formulated a five-year recycling strategy, intending to increase the proportion of Recycled Aluminium in raw materials from 5% to 20%, with a plan to review the strategy every five years.  However, the Entity has not publicly disclosed its recycling strategy.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Waste Aluminium Recycling Strategy formulated by the Entity includes plans to increase social publicity and promotion of the use of Recycled Aluminium, participate in activities of Aluminium industry associations or technical institutions such as the National Nonferrous Metals Standardization Technical Committee, and promote the recycling technology of Recycled Aluminium. The Entity plans to increase the use of Recycled Aluminium in the supply chain while ensuring the quality of raw materials.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity reported its use of raw materials and energy use and its Scopes 1, 2 and 3 Greenhouse Gas (GHG) emissions. The GHG Report has been verified by a Third Party and is available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a>  However, there is a discrepancy in the Entity's GHG emissions data regarding the average GHG emissions for one tonne of Aluminium.
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	Minor Non-Conformance	The Entity has formulated a five-year GHG Emissions Reduction Plan, with a total 50% reduction for Scopes 1 and 2 and 30% for Scope 3. The Entity has also set a 2050 emissions reduction target, including measures to install photovoltaic power generation, purchasing green electricity, and improve process methods. The Entity has disclosed its GHG Emissions Reduction Path and targets in the 'Implementation



CRITERION	RATING	COMMENT
		<p>Plan for Greenhouse Gas Emission Reduction':  <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, the Entity's GHG Emissions Reduction Plan does not match the global temperature rise target of 1.5 degrees Celsius.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed the 'GHG Management Manual' and 'GHG Work Procedures' and established a GHG Management Committee to oversee operational control requirements, and evaluation processes. The work procedure requires using the most recent carbon emission factors for domestic fuel, the latest power grid emission factors for each province, and the IPCC GWP (Intergovernmental Panel on Climate Change Global Warming Potential) coefficient to create an annual GHG emissions report. It also identifies the department responsible for providing the activity data.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has identified the main air pollutants within its plant and tests the emissions annually as required. The test results did not exceed the standard limits. Air pollutant emissions and reduction plans are available at:  <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, the Entity did not disclose any quantitative data on air pollutants, actual emission types or emission reduction plans.</p>
6.2a-g Discharges to Waters	Minor Non-Conformance	<p>According to the Entity's Completion Environmental Protection Acceptance Test Report in December 2021, wastewater is only domestic sewage, and no production wastewater is generated. Domestic sewage is discharged directly to the sewage treatment plant through municipal pipelines. Water pollutant emissions and reduction plans are available at:  <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, quantitative data regarding discharge amounts is not published.</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>In accordance with the requirements of Applicable Laws and regulations, the Entity has established Emergency Response Plans for environmental emergencies and has formulated on-site disposal plans that include chemical and Hazardous Waste Leakages. A risk assessment report on environmental emergencies has been prepared, the consequences have been analysed, and risk prevention and control and emergency measures have been formulated.</p> <p>A Leakage Risk Identification report has been established, and the Entity's Leakage risk analysis process and control methods have been clarified and are available at:  <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, during the Audit, it was found that the Entity had a lack of Leakage prevention measures for chemicals.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established the Leakage Risk Identification and Evaluation Checklist. Interviews on the site have revealed that there have been no Spills or Leakages since the Entity joined ASI. Through online searches, no records of environmental accidents have been found.</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has established a Hazardous Waste list, signed Hazardous Waste disposal contracts with two qualified companies and provided Hazardous Waste business licenses for two companies. Through the Hazardous Waste transfer bills provided by the Entity and combined with the on-site Audit, the Entity complies with the local statutory requirements for the Hazardous Waste disposal process. The Entity has disclosed the solid waste management list for 2023, available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>However, the solid waste management list does not include quantitative data on general solid Non-Hazardous Waste.</p>
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.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified its main water use areas and statistics on the consumption of water resources, specifying the use and final destination of water resources. In terms of resource consumption, surface water pollution and groundwater pollution, the overall risk assessment conclusion is low. The Entity has produced a Water Risk Assessment Report, available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the water-related risk assessment rated the impacts as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>Based on the analysis of the environment, the Entity has prepared a Biodiversity Risk Assessment Report: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>The report confirms the risks and impacts on Biodiversity and Ecosystem Services regarding pollution and Alien Species and formulates prevention and control measures. It was concluded that the risks were manageable and that the overall risk is low.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment report determined the risks and potential impacts were low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment report determined the risks and potential impacts were low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment report determined the risks, and potential impacts were low and there are no identified Priority Ecosystem Services.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity identified and assessed the possible ways in which Alien Species could be introduced and concluded that there were no Alien Species in the vicinity of the physical site. The Entity has implemented precautionary measures to keep the risk of Alien Species under control.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage sites in the vicinity of the Entity. Regardless, there is a documented commitment that prohibits entry into environmentally sensitive areas such as World Heritage sites, nature reserves and religious shrines.
8.6a-d Protected Areas	Conformance	Through interviews and mapping software, it was confirmed that there are no Protected Areas in the vicinity of the Entity. The Entity has clarified in its documents the prohibition of construction projects within nature reserves.
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a comprehensive management Policy that includes respect for Human Rights and women's rights and the prohibition of Discrimination. The Entity stipulates that the Policy should be evaluated annually, and relevant departments should propose changes when there are substantial changes.</p> <p>The Entity has prepared a Human Rights Evaluation Report and conducted the evaluation based on three parts: topic determination, information collection, and analysis evaluation process, focusing on conducting Human Rights impact analysis regarding employees. Topics include the right to work, Child Labour, health, religious freedom, non-Discrimination, non-Harassment, and women's rights. The report provided information on the population, including gender ratio, ethnicity, and religious beliefs.</p> <p>The evaluation concluded that there are no Human Rights issues. The 'Gender Equality and Protection of Female Employees' Rights and Interests Report' is available at:  <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established 'Management Measures for the Protection of Female Employees' and evaluates the management measures every five years. The Entity has prepared a report on gender equality and protection of female employees' rights. The Entity recognised relevant laws and regulations to protect women and implemented the principles of equal pay for equal work and equal employment. Employment is not limited to only men, and the marital status of women is not considered as part of employment.</p> <p>Female employees' rights are protected, and they are prohibited from being exposed to hazardous positions during pregnancy. According to employee interviews, employees are entitled to the corresponding legal rights and benefits for female employees.</p>

CRITERION	RATING	COMMENT
		<p>The Entity's effectiveness of the measures taken to promote gender equity is disclosed in the 'Report on Gender Equality and Protection of the Rights and Interests of Female Workers', see 1.3.4 and 1.3.3: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories and resources that are directly affected by their activities. The Entity's surrounding area is an industrial park that belongs to the Dare Group.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories and resources that are directly affected by their activities.
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 or their lands, territories and resources that are directly affected by their activities.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, the surrounding area of the Entity is an industrial zone, and the nearest small temple is over three kilometres away.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, the surrounding area of the Entity is an industrial zone, and the nearest small temple is over three kilometres away.
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as no resettlements are being considered or have taken place or are expected to take place during the certification period.</p> <p>The Entity has no major projects after 1 January 2022, and the last expansion of the Group's industrial park took place in 2019.</p>
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity has conducted an assessment of potentially Affected Populations and Organisations and prepared a 'List of Assessment and Response Measures'. The Entity has evaluated relevant government departments, surrounding communities, cultural and Human Rights, laws and regulations, geographical environment, and other ESG aspects.</p> <p>The Entity identified the current situation, evaluated the risk level, developed response measures, implemented the ISO 45001 system, employee psychological safety, and developed emergency plans. The Entity required resources to be provided to the community in accordance with the response measures requirements and conducted a re-evaluation of the measures in case of defects, significant changes, or within five years of its implementation.</p> <p>However, the Entity did not disclose the plans of the Affected Populations and Organisations.</p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has established 'Management Measures for Prohibiting the Use of Conflict Minerals' which stipulates the identification of raw material sources and prohibits the purchase of Aluminium materials from Conflict-Affected or High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity's Purchasing Department conducts Due Diligence on suppliers and has issued 'conflict free mineral commitment letters' to major Aluminum suppliers.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity's '2024 Conflict Minerals Survey Report' indicates that they have conveyed the latest supply chain Policies and procurement requirements to upstream suppliers, signed a 'Supplier Letter of Notice' with suppliers, and clarified the requirement to prohibit the procurement of conflict minerals. Five Aluminium foil raw material suppliers have signed the 'conflict-free mineral commitment letters'.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The ASI Performance Standard Initial Certification Audit in November 2024 fulfilled the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity's 2024 Conflict Mineral Survey Report is available at: <a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a>
9.9 Security practice	Conformance	<p>The security personnel are the Entity's employees and are managed by the EHS department. The 'Security Management Regulations' stipulate that security personnel are responsible for registering personnel entering and leaving, inspecting goods entering and leaving, and must carry out their duties in a civilized manner, treat people politely, and verbally or physically harass employees.</p> <p>The Security Management Regulations also stipulate that security personnel who cause damage to the Entity's reputation by violating regulations and Policies will be demoted or dismissed. Serious cases will be referred to the legal department for further legal action.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as the Entity follows 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 Management System for the administration of Freedom of Association and peaceful assembly and respects employees to exercise their rights regarding Freedom of Association and Collective Bargaining. The Entity has established a Union, and employees are free to join or not. The Entity supports and fulfils the functions of the employee Union by organising different forms of activities every year.
10.2a Child Labour	Conformance	The Entity has established measures that specifies the requirements for the prohibition of Child Labour and the protection of underage Workers. The youngest employee currently employed by the Entity is at least 18 years old and no Child Labour or underage labour has been

CRITERION	RATING	COMMENT
		identified through the on-site Audit and interviews. The Entity does not support the Worst Forms of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity has established measures for the prohibition of Forced Labour which explicitly prohibit any form of Forced Labour. Through interviews and the on-site Audit verified that the employees directly sign labour contracts with the Entity and there is no participation of outsourcing companies. There is no punitive deduction for employees, no unreasonable expenses, and no debt labour. Employees have the freedom to work as well as the freedom to leave work. The Entity has developed a Modern Slavery and Human Trafficking Statement, available at:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established a document that clarifies the requirements for the prohibition of Discrimination and treats employees equally in the course of their work. Through the Audit, the Entity demonstrated they achieved implementation of 'equal pay for equal work'. Interviews highlighted that the working environment in the Entity is positive and that there was no Discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established documents, clarified internal and external information transmission and communication methods and established ways to facilitate employee communication through contact numbers, mailboxes, and suggestion boxes. The Entity has established a 'Complaint and Report Management Document' and has various ways and means to receive and handle complaints and reports. Interviews confirmed that employees were aware of these methods and did not fear retaliation.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a management method for the prohibition of Violence and Harassment and the ASI Policy (Summary of Management Policies). The Policy is available on the factory floor and next to the clock-out machine. Combined with the training of the ASI Policy, the employees can understand and familiarise themselves with the Policy of prohibiting Violence and Harassment. The Entity's ASI Code of Conduct is available at:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p> <p>Interviews confirmed that there are no incidents of Violence and Harassment at the Entity nor witnessed by employees.</p>
10.7a-c Remuneration	Conformance	<p>Employment contracts are signed by both parties and includes the necessary basic remuneration information, and complies with the requirements of local laws and regulations. The wages paid by the Entity are higher than the local minimum wage. The Entity pays Overtime pay by the statutory requirements and a sampled review of records of wages, the Overtime wages paid comply with the requirements of local laws and regulations. The Entity's payroll is made by bank transfer, which is in line with local payroll regulations.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>As part of the Entity's attendance management measures, the Working Time system has been formulated and the Working Time regulations for the regular day shift have been clarified to comply with the legal requirements. The actual Overtime worked by employees meets the requirements of local regulations.</p>

CRITERION	RATING	COMMENT
		However, the average daily Working Time in the last six months exceeded 8 hours, and the Entity's method of calculating employees' annual leave does not comply with regulations.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established a document for the management of Freedom of Association and peaceful assembly to clarify the rights and interests of employees. The Entity informs employees of their rights and interests which are documented in ASI Policy (Summary of Management Policies) via training.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has established an ISO 45001 certified Occupational Health and Safety (OH&amp;S) Management System, and is able to provide mature Management System documentation for the duration of the validity period.</p> <p>However, during the Audit it was identified that there are non-compliances with the management of safety exits, indication signs and safety exit signs, use of Personal protective equipment (PPE), occupational disease hazard reminders, flammable material stacking and fire-fighting facilities at the site.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has established and implemented an OH&amp;S Management System, with the most recent second supervision and audit of the OH&amp;S Management System conducted in July 2024. The Entity conducts regular internal audits and management reviews, including an evaluation of OH&amp;S performance and identifies improvement needs. The public disclosure of the effectiveness of its OH&amp;S Management System is available in the Sustainable Development Report, pages 6-9:</p> <p><a href="https://www.dareglobal.com/company_news/1146.html">https://www.dareglobal.com/company_news/1146.html</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity's OH&S Management System covers all departments and employees and the effectiveness of the implementation of the OH&S Management System is evaluated through the monitoring of OH&S performance indicators. The Entity has established an employee representative system and the elected employee representatives have the authority to assist employees in dealing with OH&S incidents. Employees are aware of the health and safety Policies and complaint procedures and are willing to use them without fear of retribution.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 March 2025	Initial Certification Audit – Full Certification