

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Suntown Technology Group Corporation Limited

CERTIFICATE NUMBER

25

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

30 OCTOBER 2023

DATE OF EXPIRY

29 OCTOBER 2026

CERTIFIED SINCE

30 APRIL 2019

## AUTHORISED BY

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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

Suntown Technology Group  
Corporation Limited including the  
Aluminium re-melting, refining and  
recycling and semi-fabrication  
activities associated with the  
manufacture of aluminium foil at  
sites in Changsha and Changde  
(China).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Suntown Technology Group Corporation Limited
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of Aluminium foil at sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (12 – 15 March 2019)</li><li>Re-Certification Audit and Scope Change (28 – 29 September 2022)</li><li>Surveillance Audit (25 – 27 March 2024)</li><li>Surveillance Audit (3 – 5 March 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>12 – 15 March 2019 (Initial Certification Audit)</li><li>28 – 29 September 2022 (Re-Certification Audit and Scope Change)</li><li>25 – 27 March 2024 (Surveillance Audit)</li><li>3 – 5 March 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>11 April 2019 (Initial Certification Audit)</li><li>6 January 2023 (Re-Certification and Scope Change Audit)</li><li>19 April 2024 (Surveillance Audit)</li><li>22 April 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 15 March 2019)</u></p> <p>The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at the sites in Changsha and Changde (China).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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#### Re-Certification Audit and Scope Change (28 – 29 September 2022)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at the sites in Changsha and Changde (China).

Supply chain activities included in the Audit Scope:

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

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

#### Surveillance Audit (25 – 27 March 2024)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities with the manufacture of Aluminium foil at sites in Changsha and Changde (China).

Supply chain activities included in the Audit Scope:

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

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

#### Surveillance Audit (3 – 5 March 2025)

The Audit Scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting and casting processes at the Changde site, and cold rolling, heat treatment, cutting and packaging at the Changsha site.

Supply chain activities included in the Audit Scope:

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

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

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#### AUDIT OUTCOME

- Full Certification

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#### 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.

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#### CERTIFICATION PERIOD

30 October 2023 – 29 October 2026

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#### NEXT AUDIT TYPE

Re-Certification Audit

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NEXT AUDIT DATE	29 October 2026
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CERTIFICATE NUMBER	25
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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.

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## ENTITY OVERVIEW

Suntown Technology Group (SNTG) (the 'Entity') was established in 2003, and has its headquarters located in the Wangcheng District, Changsha City, Hunan Province. Its main products include 'double zero' Aluminium foil for food packaging in the food and beverage industry, as well as Aluminium templates for construction. The annual total production of Aluminium foil products is approximately 150,000 tonnes.

The Entity operates primarily through two production plants, including the Changde factory, responsible for remelting and casting rolling processes, and the Changsha factory, which undertakes cold rolling and packaging processes. The Certification Scope covers the Entity's production of its 'double zero' Aluminium foil products. The Entity's production of its Aluminium foil products involves approximately 500 employees.

## 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
<b>SYSTEMS</b>	Medium	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a management process for the identification and assessment of ASI-related legal requirements and other requirements. The Compliance evaluation is conducted annually, and results are recorded.
1.2 Anti-Corruption	Conformance	The Entity has established a Policy and management procedure on anti-Corruption. The anti-Corruption Policy is communicated to all Stakeholders. The whistleblowing channel, investigation process and disciplinary procedure have been established. The Entity has identified and assessed risks relating to business ethics, high risk positions and has implemented control measures as required.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct that addresses the environmental, social and governance principles of the ASI Performance Standard. The Code of Conduct is reviewed during the annual management review meeting, or upon changes to the Business, or on indication of a control gap. The Code is publicly disclosed at: <a href="http://www.chinasnto.com/bocupload/202404/1.3%20Code%20of%20Conduct%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/1.3%20Code%20of%20Conduct%20(Public%20Version).pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented ASI Management Policies that address the Environmental, Social and Governance (ESG) practices included in the ASI Performance Standard. These Policies have been approved by the Entity's General Manager, who demonstrates a commitment to implement the Policies through provision of resources. The ASI Management Policies are reviewed during the annual management review meeting, or upon changes to the Business, or on indication of a control gap.  The Policies are posted throughout the site and are communicated with employees. Training is also undertaken for relevant employees. The Policies are publicly disclosed at: <a href="http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Policies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Policies%20(Public%20Version).pdf</a>
2.2a-c Leadership	Conformance	A senior Management Representative has been appointed and responsibilities and authorities of this role and other management are defined to implement the ASI Standards, including to lead the communication of the Policies and providing the needed resources.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established, implemented, maintains and continually improves its Environmental Management System, which is certified against ISO 14001:2015.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety impacts have been identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts have been established and implemented.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented a Responsible Procurement Policy, Supplier Code of Conduct, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Due Diligence audits at major suppliers' sites.</p> <p>The Responsible Procurement Policy and Supplier Code of Conduct are available at:  <a href="http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Polocies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Polocies%20(Public%20Version).pdf</a> and  <a href="http://www.chinasnto.com/bocupload/202404/2.4%20Code%20of%20Conduct%20for%20Suppliers%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.4%20Code%20of%20Conduct%20for%20Suppliers%20(Public%20Version).pdf</a></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 past two years. Regardless, the Entity annually assesses their impacts regarding the environment, health and safety, and social responsibility including Human Rights.
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 past two years. Regardless, the Entity annually assesses their impacts regarding social responsibility including Human Rights and how Baseline Conditions are affected by Historic Aluminium Operations.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates. Emergency Response Plans are developed and implemented. The Entity conducts annual emergency response drills to assess the effectiveness of the Emergency Response Plans and emergency response training with employees is undertaken.</p> <p>The Entity commits to conducting a reassessment of the Emergency Response Plans in the event of any changes within the organisation that result in a modification of the nature and scale of emergency risk. Additionally, the Plans are reviewed when signs of control deficiencies arise. The Entity's Emergency Response Plans are publicly available at:  <a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Public%20Version).pdf</a> and  <a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf</a></p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Management (BCM) system for identified emergency situations that may cause a suspension of the Business, alter the operations or adversely impact environmental, social and governance risks, and has established associated control measures. The BCM Manual is reviewed in the annual management review meeting, and upon any changes to the Business, or indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the management process for mergers and acquisitions based on the requirement of the ASI Performance Standard. No such activity has occurred in the past three years.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Policy and procedures to handle closures, decommissioning and divestment. No such activity has occurred in the past three years.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has published its annual Sustainability Report for 2024, which discloses its governance approach to environmental, social and economic impacts and its performance regarding governance, environment, Human Rights and Labour Rights: <a href="http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf</a>
3.2 Non-compliance and Liabilities	Conformance	As per the official websites of the relevant government agencies and NGOs, the Entity had not had any Material fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Laws in 2024. The Entity publicly discloses such information in the Sustainability Report 2024: <a href="http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf</a>
3.3a-c Payments to Governments	Conformance	All payments to governments are legally required, including taxes. The information is publicly disclosed in the Sustainability Report 2024, page 32: <a href="http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established various whistleblowing/ complaints/ grievance channels including a hotline for external stakeholders (86-400-056-2828) and employees (0731-89620920) and an email address ( <a href="mailto:snto_shenji@chinasnto.com">snto_shenji@chinasnto.com</a> ). A Stakeholder complaints management procedure has been established and implemented.  The Entity's ASI PS Management Manual has defined that the Complaints Resolution Mechanism shall be reviewed in the annual management review meeting, upon a change to the Business, or on indication of a control gap. The Complaints Resolution Mechanism is publicly disclosed in the Group Stakeholder Complaint Management Regulations: <a href="http://www.chinasnto.com/bocupload/202404/3.4%20Stakeholder%20Complaint%20Management%20Regulations%20and%20Annual%20Review%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.4%20Stakeholder%20Complaint%20Management%20Regulations%20and%20Annual%20Review%20(Public%20Version).pdf</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	For its Aluminium foil products, which currently consist solely of single-alloy Aluminium foil for food packaging, the Entity has performed a detailed 'cradle-to-gate' Life Cycle Assessment (LCA). This assessment encompasses all processes involved in obtaining and producing primary materials and energy resources, ensuring a thorough evaluation of the environmental impacts from the initial stages of material extraction to the point where the product is ready for market.  However, the sensitivity analysis is incomplete, with some of the main parameters, such as electricity consumption and transportation, not included in the assessment.



CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has established and evaluated the environmental Life Cycle Assessment (LCA) of its Aluminium foil products in full compliance with the ISO 14044 standard. A summary of the 'cradle-to-gate' LCA, including the main environmental impact assessment results for its primary Products, has been disclosed on the Entity's official website.</p> <p>The report summary provides essential details and assumptions of the LCA, including explanations of the LCA scope and evaluation results. Key environmental impact indicators, such as Global Warming Potential (GWP) and acidification potential, are included in the disclosed information to ensure transparency.</p> <p>The Entity also commits to providing customers, upon request, with detailed and comprehensive 'cradle-to-gate' LCA information for its Aluminium foil products, supplementing the publicly available report summary. The LCA information can be accessed at: <a href="http://www.chinasnto.com/bocupload/202404/4.1%20LCA%20Report(Abstrat,%20Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/4.1%20LCA%20Report(Abstrat,%20Public%20Version).pdf</a></p>
4.2 Product Design	Conformance	<p>The Entity has implemented protocols for the integration of LCA into the Product design process. This LCA mandate necessitates the consideration of multiple environmental factors, such as carbon footprint, energy usage, water consumption, air emissions, and waste generation among others. Currently, the emissions of Greenhouse Gases have been incorporated into the design methodology, as guided by the Entity's specific sustainability objectives.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established a target for the collection, recycling, and/or reuse of Process Scrap at 100%, and a Scrap management procedure has been established to ensure the achievement of this objective. The Entity has implemented various technological and management measures to reduce the generation of Aluminium Process Scrap in its own operational processes. It also collects and recycles Aluminium Process Scrap that is internally generated.</p> <p>With the current single alloy composition, there is no need for separation of Process Scrap. The target of 100% collection, recycling, and/or reuse of Scrap has been largely accomplished.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has developed a strategy for utilising Recycled Aluminium, with the final goal for 2028, to reach an annual consumption of 60,000 tonnes of Recycled Aluminium, which is equivalent to 40-60% of the Entity's total annual raw material consumption.</p> <p>The Entity has committed to annually review the achievement of its Recycled Aluminium targets and adjusting the related strategies, targets and plans following annual management review meetings.</p> <p>The recycling strategy is publicly disclosed on the Entity's website at: <a href="http://www.chinasnto.com/bocupload/202404/4.4%20Recycled%20Aluminium%20Project%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/4.4%20Recycled%20Aluminium%20Project%20(Public%20Version).pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>China does not have a well-developed system for collecting and recycling Aluminium Scrap at the local, regional, or national level, and as such, the Entity depends on other companies within the SNT0 Group to collect and reuse Post-Consumer Aluminium Scrap. The SNT0 Group is continually improving its cooperation with customers to increase the recycling rate of Aluminium Scrap.</p>

## 5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
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 energy consumption and Greenhouse Gas (GHG) emissions at the organisational level. A Third-Party verification of emissions data was performed to ensure accuracy and transparency.</p> <p>The Entity's GHG Management Report includes Scope 1, 2 and Scope 3 (Category 1) GHG emissions. The verified emissions data and details are publicly disclosed in the GHG Management Report, accessible at: <a href="http://www.chinasnto.com/bocupload/202404/5.1%20&amp;%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/5.1%20&amp;%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf</a></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 GHG Emissions Reduction Plans	Conformance	<p>The Entity conducts regular annual inventories of its organisational GHG emissions in accordance with the requirements of the ISO 14064 Standard. Using 2023 as the baseline year, the Entity has developed a GHG Emissions Reduction Plan and Pathway that is aligned with the 1.5°C warming scenario based on the ASI Entity GHG Pathway Tool. According to the Entity's publicly disclosed GHG Emissions Reduction Plan and Pathway, the Entity has established targets to reduce its product-related GHG emission intensity from 9.11 tonnes (t) CO<sub>2</sub>e/tonne of Aluminium in 2023 to 7.5 t CO<sub>2</sub>e/t by 2028.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity's GHG Emissions Reduction Plan was developed using the ASI Entity GHG Pathway Tool. The Entity has set medium- and long-term specific reduction targets, which include all Direct GHG Emissions and significant Indirect GHG Emissions. Projections indicate that by 2028, the GHG emissions per unit of product will be reduced to 7.5 t CO<sub>2</sub>e/t, and the target of 4.51 t CO<sub>2</sub>e/t will be achieved by 2033. The Entity's disclosed GHG Emissions Reduction Strategy, Plan, and Targets report, includes the latest version of the reduction pathway, the updated reduction plans, and the progress made in 2024.</p> <p>The Entity has committed to review its GHG Emissions Reduction Pathway in the event of alterations to reduction baselines or targets. The document is accessible at: <a href="http://www.chinasnto.com/bocupload/202404/5.1%20&amp;%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/5.1%20&amp;%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and uses a carbon Management System for both factories and Products and obtained a carbon footprint statement from certification body CQC. GHG and energy monitoring records were provided for review during the Audit. A GHG Emission Reduction Plan has also been developed, which is incorporated as part of the Entity's business improvement strategies and plans. The methodology for determining Direct and Indirect GHG Emissions is also specified. The implementation of this Plan is reviewed monthly.</p> <p>The Entity has compiled the GHG Emissions Reduction Plan to define the management approaches on GHG emissions, with a primary focus on energy management. Site observation, document review</p>

CRITERION	RATING	COMMENT
		and interviews determined that the Entity manages energy consumption and monitors the Management System performance, following the 'Plan-Do-Check-Act' approach, to achieve the initiatives incorporated in the GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has identified Volatile Organic Compounds (VOCs) and oxides of nitrogen (NOx) as its primary sources of air pollution. To address these emissions, it has implemented an Air Emissions Management Program, which includes regular maintenance of air pollution control facilities and frequent monitoring of exhaust emissions. The Entity is committed to updating its air emissions management plan in response to significant risks and reviewing the reduction strategies regularly. Annual monitoring reports confirm compliance with regulatory requirements</p> <p>The Entity has publicly disclosed its Emissions to Air in the Air Pollutant Reduction Plan, available at:  <a href="http://www.chinasnto.com/bocupload/202404/6.1%20&amp;%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.1%20&amp;%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf</a></p> <p>Details of annual emissions are disclosed in the Annual Pollutant Discharge Permit Implementation Report, available at:  <a href="https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b](https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b)">https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b](https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b)</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity only conducts Aluminium casting, rolling and foil rolling processes, which do not produce any process wastewater during production. Based on the evaluation of water resources and the annual monitoring of domestic wastewater discharge, the Entity's use of domestic water has a very low impact on water resources and the environment. Nonetheless, the Entity has established a goal to decrease wastewater discharge by between two and five percent by 2024. The Entity has committed to developing a water pollutant reduction plan as required should any process wastewater be generated in the future. The Entity's Annual Water Pollutant Emission Report is publicly accessible at:  <a href="https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b](https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b)">https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b](https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&amp;dataid=3f80d3486b984fdcbe9944427fcf0a7b)</a></p> <p>The Wastewater Reduction Plan is available at:  <a href="http://www.chinasnto.com/bocupload/202404/6.1%20&amp;%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.1%20&amp;%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a procedure to assess and manage the risks of Spills and Leakages of pollutants and has developed appropriate emergency response actions and plans. The risk identification and Emergency Response Plans (ERPs) are publicly available at:  <a href="http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf">http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</a></p>

CRITERION	RATING	COMMENT
		The Entity has undertaken monitoring to detect any possible sources of Spills and Leakages. The Entity has also committed to update and improve the relevant ERPs and Leak or Seepage Prevention Management Plans whenever there are any changes that may affect the significant risks associated with Spills and Leakages, or on indication of weaknesses in control.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity, as there has been no recorded incidents of Spills or Leakages since the Entity joined ASI. Regardless, the Entity has outlined the process for reporting Spills and Leakages in its Environmental Protection Management Procedure and Emergency Response Plans. The most recent versions of the Spills and Leakages risk assessment report and the ERPs are publicly available at: <a href="http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf">http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</a>
6.5a-c Waste Management and Reporting	Conformance	Waste management is addressed in the Entity's Environmental Management System. The Entity has implemented a Waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates any Material impacts through the reuse and recycling of Waste. The disposal of Hazardous Waste is in compliance with applicable legal requirements. The Entity has publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated from its activities in 2024 in the Solid Waste Management Report: <a href="http://www.chinasnto.com/bocupload/202404/6.5%20Solid%20and%20Hazardous%20Waste%20Generated%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.5%20Solid%20and%20Hazardous%20Waste%20Generated%20(Public%20Version).pdf</a>
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	The Entity has developed a system to collect and reuse Aluminium Dross. The Entity evaluates the management of Dross reuse monthly and Dross residues are used by other companies in products such as building materials. An annual onsite inspection of the Dross reuse company is undertaken to ensure Dross are not inappropriately disposed of. The Entity has created a plan to increase the extraction of Aluminium by processing Dross residue and increase reuse of processed Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has measured and documented its water intake and usage based on the source and type of water in the Environmental Impact Assessment and water resource risk assessment. The Entity has evaluated the water-related risks, considering the adjacent water environment, water intake and discharge, and the effectiveness of existing management measures. The Entity's water resource risk is assessed as low, and there are no significant water-related risks within the Entity's Area of Influence.  The Entity has prepared a Water Resources Assessment Report and Management Plan, which includes a water balance diagram, available at:

CRITERION	RATING	COMMENT
		<a href="http://www.chinasnto.com/bocupload/202404/7.1%20Water%20Resources%20Risk%20Assessment%20Report%20&amp;%20Management%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/7.1%20Water%20Resources%20Risk%20Assessment%20Report%20&amp;%20Management%20Plan%20(Public%20Version).pdf</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's water-related risks are identified and assessed as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A qualified third party conducted the Environmental Impact Assessment (EIA), which included the evaluation of Biodiversity and Ecosystem Services risks and impacts, and the local environmental protection agency has approved the EIA Report. According to the EIA and the Biodiversity risk assessment outcomes, the Entity's Area of Influence does not include any areas that are sensitive for Biodiversity. The Entity is situated within an industrial zone that the local government has planned and has a functional Environmental Management System. Therefore, the risk level is determined as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable to the Entity, as the risks and potential impacts identified are assessed and documented as low. Furthermore, no Priority Ecosystem Services were identified in the Environmental Impact Assessment.
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 assessed the risk of Alien Species and implemented control measures for the high risks identified. An inventory of alien and/or invasive species is maintained and the Entity has implemented a management plan to proactively prevent the accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. Training on the management of Alien Species has been provided to both Workers and contractor personnel. Management review is conducted annually.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed within its ASI PS Management Manual to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has committed within its ASI PS Management Manual to protecting the environment. As outlined in the EIA Report, and approved by local EPA, there are no Protected Areas in the Entity's Area of Influence.
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.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has implemented a Policy with the commitment to respect Human Rights including Gender Equity, and has communicated the Policy to all employees:  <a href="http://www.chinasnto.com/bocupload/202404/2.6%20Human%20Rights%20Impact%20Assessment%20Reports%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.6%20Human%20Rights%20Impact%20Assessment%20Reports%20(Public%20Version).pdf</a></p> <p>The Entity has established and implemented a Human Rights Due Diligence process and maps Affected Populations and Organisations. The risks relating to Human Rights are identified and assessed, and the control plan for Human Rights impacts is established and implemented. The Human Rights Due Diligence process is reviewed in the annual management review meeting.</p> <p>However, the Entity had not conducted a mapping of Affected Populations and Organisations assessing the impact on Human Rights.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect for the rights of women and a program to promote gender equity and women's empowerment in the whole employment process.</p> <p>No complaints have been received from female Workers and the interviewed female Workers confirmed that they know their rights and no negative feedback was received.</p> <p>The Entity has assessed the program on gender equity and women's empowerment and has disclosed this report at:  <a href="http://www.chinasnto.com/bocupload/202404/9.2%20Report%20on%20the%20Effectiveness%20of%20Gender%20Equality%20Measures%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/9.2%20Report%20on%20the%20Effectiveness%20of%20Gender%20Equality%20Measures%20(Public%20Version).pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
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, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity does not have projects that have caused or require resettlement.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a Stakeholder engagement process to actively identify and address the primary concerns of the Affected Population and Organisations. To effectively respond to these concerns, the Entity has developed a range of plans. These plans are regularly reviewed on an annual basis, and any necessary improvements are identified and implemented. The Entity's performance in executing these plans and actions is disclosed in the Sustainability Report: and the Prevention and Mitigation Plan for Adverse Impacts on Neighbouring Stakeholders:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/9.7%20Plans%20to%20prevent%20and%20reduce%20negative%20Impacts%20on%20Neighbouring%20Stakeholders%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/9.7%20Plans%20to%20prevent%20and%20reduce%20negative%20Impacts%20on%20Neighbouring%20Stakeholders%20(Public%20Version).pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has established a Policy to not using conflict minerals and has established and implemented an appropriate Management System. The Entity has provided training for all relevant employees, and the Policy and requirements are communicated to suppliers.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has conducted a supply chain risk assessment and requires suppliers to complete a Responsible Mineral Due Diligence Management Form to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs). As confirmed by the risk assessment report, there are no materials sourced from CAHRAs.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>Through the Entity's internal assessment, no materials have been sourced from CAHRAs. However, the strategy to respond to identified risks, if they are identified in future, has been established.</p> <p>The Entity has conducted Due Diligence monitoring on its Aluminium supply chain. The risk identification and assessment determined that no raw materials are sourced from CAHRAs, the risk is low, and no further actions are currently required.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity has conducted a supply chain risk assessment and requests suppliers to conduct a self-assessment that addresses the requirements on CAHRAs. Two major suppliers have been audited against the ASI Performance Standard and the other two material suppliers are ASI Certified.</p> <p>The Entity's Due Diligence practices were audited as part of this ASI Audit.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity has defined within its ASI PS Management Manual the requirement for annual public reporting on the performance of supply chain Due Diligence regarding CAHRAs. The Entity's performance of its supply chain Due Diligence is disclosed in the Sustainability Report 2023, Section 3.2:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.1%202024%20Sustainable%20Development%20Report%20(Public%20Version).pdf</a></p>
9.9 Security practice	Conformance	<p>The Entity has implemented a security Policy that addresses Human Rights. The security guards are trained on rights and responsibilities in terms of respecting internal and external Stakeholders, including Workers.</p> <p>The responsibilities and authorities of security guards are limited to personnel safety and property safeguarding, vehicle management, and visitor registration. Body searches are not permitted and the restriction on Workers' movement is prohibited. All security activities</p>



CRITERION	RATING	COMMENT
		<p>are to be undertaken in a way that respect Human Rights. Specific training is provided to security guards.</p> <p>No complaints against security activities have been received.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are some restrictions on the right to Freedom of Association in China. Regardless, the Entity has a Policy to respect the Freedom of Association and has implemented an employee representative committee and employee representatives are freely elected by employees.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>The Entity supports alternative means of association for employees via an employee representative committee. The representatives are freely elected. The representatives hold meetings with management to consider and manage any employee concerns.</p>
10.2a Child Labour	Conformance	<p>There is no Child Labour or young Workers at the Entity. The youngest Worker was born in May 2005 and commenced work at the Entity in February 2024.</p>
10.3a-c Forced Labour	Conformance	<p>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.</p> <p>Worker and management interviews, document review and site observations confirmed that the Entity neither engages in nor supports the use of Forced Labour. Workers are hired directly by the Entity, and do not pay any fees or deposits associated with employment. No loans are provided to Workers. Workers retain their identity documents. The basic freedom of movement is respected by the Entity and there are no unreasonable restrictions. Workers can freely terminate their employment with appropriate prior notice.</p> <p>The Entity has prepared and disclosed a 2023 Modern Slavery Statement, available at:  <a href="http://www.chinasnto.com/bocupload/202404/10.3%20Statement%20Against%20Modern%20Slavery%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/10.3%20Statement%20Against%20Modern%20Slavery%20(Public%20Version).pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and no case of Discrimination has been reported or found during the Audit. The recruitment advertisements and the training, promotion and termination records indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The Entity provides training courses on Discrimination to promote a culture of non-Discrimination. The payment records demonstrate equal pay for the same work. Interviewed Workers confirmed that they feel equal within the Entity.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has established direct and frequent communication channels with the Workers and the Worker representatives. Workers can make complaints and raise concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.</p>



CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has a Policy that prohibits any form of Violence and Harassment. As part of the Entity's risk management processes, with Workers participation, the Entity has identified and assessed the risks of Violence and Harassment and established and implemented the control measures to prevent its occurrence. Training is provided to all Workers who are made aware of how to report cases. No case on Violence or Harassment has been reported or found in the Entity in the past three years.</p> <p>The Policy is reviewed in the annual management review meeting or when there is a major business change or a control gap. The Policies are disclosed at:  <a href="http://www.chinasnto.com/bocupload/202404/21%20ESG%20Polocies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/21%20ESG%20Polocies%20(Public%20Version).pdf</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity ensures labour contracts are established with all employees within one month of commencing work. The terms and conditions of the labour contract meet the requirements of the labour contract law. The wage structure is clearly defined, the basic wage is above the legal minimum wage and total remuneration meets the Workers' basic needs. Overtime is paid following the legal requirements, of 150% of the regular wage for overtime on working days, 200% for weekend work, and 300% for public holidays.</p> <p>Wage payments are made on time and without delay.</p>
10.8a-c Working Time	Conformance	<p>Working hours are recorded by a finger-scanning meter. The regular working hours are 40 hours a day, five days a week. Working hours are monitored and the monthly Overtime working hours do not exceed the legal monthly limit, and at least one day off in a week is guaranteed.</p> <p>The Entity provides leave to eligible Workers as required by Applicable Law.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights during orientation training, the provision of an Employee Growth Manual, and billboards on-site.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established, implemented, and maintains an Occupational Health and Safety (OH&amp;S) Management System that is being continually improved. Both of the Entity's Facilities hold valid ISO 45001:2018 certification.</p> <p>On-site observations, document review, and interviews with management and Workers confirmed that the OH&amp;S Management System is effective. This indicates that the system is successfully preventing workplace hazards, promoting a safe and healthy working environment, and complying with relevant regulations and standards.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity periodically evaluates its OH&amp;S Management System through various methods, including monthly safety meetings, an annual check of legal compliance, an annual internal audit based on ISO 45001:2018, and management review meetings. If any indication of a control gap emerges during these evaluations, a comprehensive analysis is undertaken to determine the need for potential corrective and/or preventive actions. This proactive approach ensures that any issues or gaps identified in the OH&amp;S Management System are resolved in a timely manner.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has published its OH&amp;S objectives and targets for 2024, as well as a comparative analyses of performance with peer businesses and leading practice in the annual OH&amp;S Management System Performance Report:  <a href="http://www.chinasnto.com/bocupload/202404/11.1%20Operation%20of%20the%20OH&amp;S%20Management%20System%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/11.1%20Operation%20of%20the%20OH&amp;S%20Management%20System%20(Public%20Version).pdf</a></p> <p>However, it was identified that the disclosure of lagging indicator information in the annual OH&amp;S Management System Performance report is incomplete.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established dedicated Environment, Health, and Safety (EHS) Committees at both Changsha and Changde. Committee meetings are held regularly to assess and monitor Health and Safety conditions within the factories. The Committees focus on identifying areas for improvement and actively promoting the development and enhancement of Health and Safety standards throughout the Entity's operations.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 April 2019	Initial Certification Audit – Full Certification
1	13 June 2023	Re-Certification and Scope Change Audit – Provisional Certification. Scope Change to apply PS V3. Change of Audit Firm to TÜV SÜD.
2	2 May 2024	<p>Surveillance Audit – Full Certification</p> <p>Correction to Rev 1 to include notice of approval for six month extension to the Certification Period due to a COVID-19 delay, resulting in expiry of 29 October 2022;</p> <p>Correction to Rev 1 Certification Period dates to 30 October 2022 – 29 October 2023 to reflect continuous period of Certification;</p> <p>Correction to Rev 1 Document Control table to reflect Rev 0 Date as 30 April 2019;</p> <p>Change of Audit Firm to DNV Business Assurance Services UK Ltd.</p>
3	1 May 2025	Surveillance Audit