ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Xiamen Xiashun Aluminium Foil Co., Ltd.

CERTIFICATE NUMBER

33

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

17 JULY 2025

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

16 JULY 2028

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

The

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Manufacture and sale of foil stock, lithographic and closure sheets, as well as ultra-thin Aluminium foil for food and beverage packaging and lithium batteries, including main processes such as remelting and casting, hot rolling, cold rolling, finishing, foil rolling, and foil finishing at the Headquarters and production facilities (Haicang Sheet Plant, Haicang Foil Plant, Huli Foil Plant) located in Fujian Province, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
ENTITY NAME	Xiamen Xiashun Aluminium Foil Co., Ltd.
CERTIFICATION SCOPE	Manufacture and sale of foil stock, lithographic and closure sheets, as well as ultra-thin Aluminium foil for food and beverage packaging and lithium batteries, including main processes such as remelting and casting, hot rolling, cold rolling, finishing, foil rolling, and foil finishing at the Headquarters and production facilities (Haicang Sheet Plant, Haicang Foil Plant, Huli Foil Plant) located in Fujian Province, China.
SUPPLY CHAIN ACTIVITIES	Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	 Initial Certification Audit (24 – 26 April 2019) Surveillance Audit (9 – 12 August 2021) Re-Certification Audit (16 – 18 May 2022) Surveillance Audit (22 – 23 May 2024) Re-Certification Audit and Scope Change (8 – 11 April 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	 24 – 26 April 2019 (Initial Certification Audit) 9 – 12 August 2021 (Surveillance Audit) 16 – 18 May 2022 (Re-Certification Audit) 22 – 23 May 2024 (Surveillance Audit) 8 – 11 April 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	 20 May 2019 (Initial Certification Audit) 28 August 2021 (Surveillance Audit) 11 July 2022 (Re-Certification Audit) 13 June 2024 (Surveillance Audit) 21 May 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	Initial Certification Audit (24 – 26 April 2019) Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge Aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing, at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant. Supply chain activities included in the Audit Scope: Aluminium Re-melting/Refining Casthouses

Semi-Fabrication

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

Surveillance Audit (9 - 12 August 2021)

The Audit Scope included the remelting, casting, hot rolling, cold rolling, and finishing (foilstock, litho stock (CTP), capstock) and foil rolling and finishing (light-gauge Aluminium foil that is less than 10 μ m and lithium battery foil) at the Head Office, Haicang Foil Plant, Huli Foil Plant, and Sheet Plant.

Supply chain activities included in the audit scope:

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

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

Re-Certification Audit (16 - 18 May 2022)

The Audit Scope covers the manufacture and sale of Foil Stock, Lithographic and Closure sheets, ultra-thin Aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. The facilities include Headquarters and the production sites Sheet Plant, Haicang Foil Plant and Huli Foil Plant.

Supply chain activities included in the audit scope:

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

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

Surveillance Audit (22 - 23 May 2024)

The Audit Scope covers the manufacture and sale of Foil Stock, Lithographic and Closure sheets, ultra-thin Aluminium foil for Food and Beverage Packaging and Lithium Battery. The main processes include remelting and casting, hot rolling, cold rolling, finishing, foil rolling and foil finishing. The facilities include Headquarters and the production sites Sheet Plant, Haicang Foil Plant and Huli Foil Plant.

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (8 - 11 April 2025)

The Audit Scope covers the manufacture and sale of foil stock, lithographic and closure sheets, as well as ultra-thin Aluminium foil for food and beverage packaging and lithium batteries, including main processes such as remelting and casting, hot rolling, cold rolling, finishing, foil rolling, and foil finishing at the Headquarters and production facilities (Haicang Sheet Plant, Haicang Foil Plant, Huli Foil Plant) located in Fujian Province, China.

Supply chain activities included in the Audit Scope:

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

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

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

17 July 2025 - 16 July 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

17 July 2027

CERTIFICATE NUMBER

33



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

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

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

ENTITY OVERVIEW

Xiamen Xiashun Aluminium Foil Company Limited (the 'Entity') was established in 1988. It is located in the port city of Xiamen on the southeast coast of China. Xiashun is wholly owned by Hong Kong Daching Enterprises Limited, with a total investment of approximately one billion US dollars. Occupying a total area of around 600,000 square meters, it has three production bases, Huli Aluminium Foil Plant, Haicang Aluminium Foil Plant and Haicang Aluminium Sheet Plant. It has a fully integrated production process for Aluminium slabs, sheets, and foil.

It is one of the world's largest manufacturers of high-quality thin gauge Aluminium foil, with an annual production capacity of 120,000 tonnes for Aluminium foil and 220,000 tonnes for Aluminium sheets. Its products are sold to customers globally and are widely used in food and beverage packaging, lithium batteries and other sectors. It is a key supplier for leading aseptic and flexible packaging companies.

The Entity actively participates in public and social welfare and charity work to give back to the Local Community. It has financed students and participated in poverty relief projects.

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	High	MEDIUM
RISKS	Medium	High	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MED	IUM	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes to conform to the requirements in the ASI Performance Standard and ensure Compliance with Applicable Law. There have been no fines or requests for corrective actions from government agencies or other Stakeholders in the past two years. The Entity conducts an annual Compliance evaluation. According to the latest evaluation, no violations have been identified.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are well implemented and trained. The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. 'Whistleblowing' channels are available to all interested parties. One case was received in 2024 which was investigated and confirmed that no Corruption had occurred.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct that addresses social and governance principles. The Policies and the associated management procedures for ISO 14001 and ISO 45001 standards address the implementation of management requirements on Environment and Occupational Health and Safety. The Code of Conduct is part of the Entity's ASI Social and Environmental Governance Policy and is available for all interested Stakeholders on the Entity's website at: https://www.xiashun.com/public/attachment/images/20250115/9ccfbaa7e09e0d489118b369816275bb.pdf
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's management Policies are consistent with the environmental, social, and governance practices. Senior management demonstrates a commitment to the implemented Policies, endorsement and support to provide sufficient
		resources for regular review of these Policies. Policies are available internally through training; for external Stakeholders, the policies are published on the website: https://www.xiashun.com/public/attachment/images/20250115/9ccfb aa7e09e0d489118b369816275bb.pdf
		Policies were reviewed at the annual management review meeting, held in February 2025.
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated. The responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate. The latest ISO 14001:2015 audit was conducted in April 2024 and there were no major non-conformances issued. The Entity has analysed the root

CRITERION	RATING	COMMENT
		cause of minor non-conformances raised and has implemented the required corrective actions.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented and documented a Social Management System and holds a valid ISO 45001:2018 certification. The latest audit was conducted in April 2024, and no major non-conformances were raised. The Entity has analysed the root cause of minor non-conformances raised and has implemented the required corrective actions.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and communicated the Responsible Sourcing Policy to all suppliers and Contractors, which covers the environmental, social and governance aspects towards the suppliers based on the ASI Performance Standard. A Due Diligence process is in place to manage the risks within the supply chain. Twenty-two suppliers were audited against the supplier management manual including ASI Performance Standard requirements in 2024. The corrective actions are required to be implemented and verified by the Audit Team.
		The Responsible Sourcing Policy is part of the ASI Social/Environmental Governance Policy and is publicly available at: https://www.xiashun.com/public/attachment/images/20250115/9ccfbaa7e09e0d489118b369816275bb.pdf
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.
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.
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certifications and has developed an Environmental Health and Safety Emergency Response Plan in coordination with safety and environmental experts and with approval from the local government. This Plan includes coordinated response actions with surrounding communities and organisations during emergencies.
		Annual emergency response drills are conducted to evaluate the Plan's effectiveness, and employees receive regular emergency response training. The Entity is committed to reassessing its emergency management plans in the event of organisational changes that alter the nature or scale of risks or if control deficiencies are identified.
		The Plan is publicly accessible on the Entity's official website at: https://www.xiashun.com/public/attachment/images/20250424/03b88fff4f8la454d6fe0334ba38f0e4.pdf
2.8a-d Suspended Operations	Conformance	The Entity has identified and assessed risks that could lead to suspended operations due to factors outside its control and the associated Material adverse environmental, social and governance impacts. The Entity has established a Business Continuity Plan to address potential Material impacts.
		The Plan will be reviewed in the annual management review meeting as per the ASI Management Manual.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity establishes the management procedure for Mergers and Acquisitions based on the requirement of the ASI Performance Standard. No mergers and acquisitions have occurred since the ASI Management System was implemented in 2018.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. There has been no closure, decommissioning or divestment activities since the ASI Management System was implemented in 2018.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's annual Social Responsibility Report 2024 includes information on the Entity's management practices and performance on governance, environment, Human Rights, and labour rights including Occupational Health and Safety. The Social Responsibility Report 2024 is available on the Entity's website at: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6edlfdb5037e0812481ld6.pdf
3.2 Non-compliance and Liabilities	Conformance	The Social Responsibility Report 2024 reported a case in which the Entity was fined for a safety issue about a warning sign on-site in the Huli plant in 2023. There are no other non-compliances or liabilities for 2024 according to the official websites of the relevant government agencies and NGOs. This information is publicly disclosed in the Social Responsibility Report 2024, section 3, page 5: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6ed1fdb5037e08124811d6.pdf
3.3a-c Payments to Governments	Conformance	According to the Social Responsibility Report 2024 t, payments to government made by the Entity are only those legally required; and there were no other payments. This information is publicly disclosed in the Social Responsibility Report 2024, section 3, page 5: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6ed1fdb5037e08124811d6.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's 'whistleblowing'/complaints/grievance mechanism has been established and is considered effective. The hotline (+86-18206079837) and email address (jubao@xiashun.com) are published for internal and external Stakeholders at: https://www.xiashun.com A 'whistleblowing' case was received in 2024, and the effectiveness of the channel was demonstrated during the Audit.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted environmental Life Cycle Assessments (LCAs), which include its Aluminium foil and sheet products. The LCAs are 'cradle-to-gate', and the impact of the various production stages and 'End of Life' recycling is assessed.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has established a control process for providing customers with information on the Products' 'cradle-to-gate' LCAs, outlining the application, approval, provision process and responsibilities.

CRITERION	RATING	COMMENT
		The Entity has publicly disclosed its LCA summary reports of two Products, both available at: Aluminium Sheet and Strip Product LCA Inventory Summary: https://www.xiashun.com/public/attachment/images/20250331/f9b0659efc0d6a4aa7f4a593bbd5d70f.pdf
		Packaging Foil Products LCA Inventory Summary: https://www.xiashun.com/public/attachment/images/20250331/c7lb6 c19b8166ac84968996fe8706429.pdf
4.2 Product Design	Conformance	The Entity has considered sustainability aspects including energy consumption and Process Scrap generation during the Product design and development process and has incorporated the proportion of Recycled Aluminium into the design objectives.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established the management process for Aluminium Process Scrap. The Process Scrap generated in the manufacturing processes for sheets and foils are all collected, packed, re-melted or sold to third parties for recycling or processing. The Process Scrap utilisation rate is 100%.
		The Entity's Products are primarily categorised into two main types based on varying alloy compositions and different applications. The Entity has implemented procedures for the collection of Process Scrap. The Scrap collection log confirms that the Entity is actively engaged in the classification and recycling of processed Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	Whilst there are no complete local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity engages with its customers to determine how to improve the recycling rate of Products at End of Life. The primary source of Recycled Aluminium for the Entity at present is Scrap Aluminium wire collected by the local municipal power supply system.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non- Conformance	In alignment with the ISO 14064 Standard, the Entity has conducted a comprehensive inventory of its energy consumption and Greenhouse Gas (GHG) emissions at the organisational level. A third-party verification of the emissions data was performed to ensure accuracy and transparency.
		According to the GHG verification report, the Entity's organisational GHG emissions for 2024 amounted to 1,564,567 tCO ₂ e. The report includes emissions from Scope 1, Scope 2 and Scope 3 Category 1.
		Verified emission data and details are publicly disclosed in the GHG Verification Report 2024, page 8: https://www.xiashun.com/public/attachment/images/20250506/9ab8a3c2b05ald586db98b5cd69266c0.pdf
		The Entity's energy consumption data are disclosed in Energy Use and Greenhouse Gas Emissions Report 2024, page 2:

CRITERION	RATING	COMMENT
		https://www.xiashun.com/public/attachment/images/20250403/1f487 57cbb01086a84547la4ebdae27e.pdf
		However, the Entity has not identified and quantified significant indirect emissions from waste disposal activities.
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	The Entity has utilised the ASI-endorsed methodology, incorporating the 1.5C degree scenario emission reduction tool to develop their medium- and long-term GHG reduction plan. This approach ensures that the Entity's GHG reduction pathway is aligned with the global 1.5°C temperature control scenario requirements.
		The 2023-2030 GHG Emission Reduction Action Plan is publicly disclosed on the Entity's official website at: https://www.xiashun.com/public/attachment/images/20250514/3c37 b062eeabfa414dac08c9b19c56a5.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non- Conformance	The Entity has conducted a full life cycle analysis of its GHG emissions, using 2023 as the baseline year to develop a 2023-2030 GHG Reduction Plan aligned with the ASI methodology. The Plan sets specific targets for emissions intensity reduction, including Scope 1 and 2 emissions and Scope 3 Category 1 emissions.
		To achieve these goals, the Entity has implemented and has planned to adopt both technological and procedural measures, including improving energy efficiency, optimising processes to reduce energy consumption, and procuring low-CPF (Carbon Footprint) raw materials.
		The 2023-2030 GHG Emission Reduction Action Plan with comprehensive details on targets and strategies for 2024-2030 is publicly disclosed on the Entity's official website: https://www.xiashun.com/public/attachment/images/20250514/3c37b062eeabfa414dac08c9b19c56a5.pdf
		The Entity is committed to annually reviewing the progress of its emission reduction plan and publicly disclosing updates and improvement measures to ensure transparency and accountability in achieving its GHG reduction targets.
		However, it was identified the Entity has not publicly disclosed the progress performance of its GHG reduction program for 2024.
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an Energy Management System in accordance with ISO 50001 standards and holds a valid ISO 50001 Certificate. Additionally, the Entity has established objectives and processes for managing carbon emissions.

CRITERION	RATING	COMMENT
		The GHG Emissions Reduction Plan defines management approaches for reducing GHG emissions with a focus on energy management such as managing energy consumption and monitoring performance.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	Waste air generated in the Entity's operations is collected and treated before discharge. The Entity has developed and implemented an Air Emissions Management Plan with actions and controls to mitigate adverse impacts. Emissions to Air are disclosed annually in the Environmental Information Disclosure Reports for each site (refer to 'Emissions Information'): Environmental Information Disclosure of Huli Aluminum Foil Factory 2024: https://www.xiashun.com/public/attachment/images/20250325/5897 2a8cab07lb0039ac570ae796l5d4.pdf
		Environmental Information Disclosure of Haicang Aluminum Foil Plant 2024: https://www.xiashun.com/public/attachment/images/20250417/7a475 738d3826e7b3c1b2b88366b1bd5.pdf
		Environmental Information Disclosure of Dongfu Strip Plant 2024: https://www.xiashun.com/public/attachment/images/20250324/45fc7 203ea5992257clefcad234fdc34.pdf
		The Entity's periodic monitoring reports demonstrate that its primary air pollutant emissions, including Volatile Organic Compounds (VOC), are consistently below statutory limits. To achieve this, the Entity prioritises equipment maintenance to optimise operational efficiency and reduce emissions. The details of the pollutant control plan are disclosed in the Environmental Information Disclosure Reports.
6.2a-g Discharges to Waters	Conformance	The Entity's approach to managing its wastewater discharges involves the implementation of an Environmental Management System and a supporting strategy to ensure compliance with local legal discharge limits. An evaluation of the monitoring reports for 2024 demonstrated that all major pollutants comply with the established standards. Furthermore, wastewater discharge volumes remain relatively low, posing a minimal environmental risk.
		The Entity has implemented measures to manage discharges such as water conservation, recycling, and pre-treatment to control and reduce water pollutant emissions. The Entity regularly reviews its water pollutant management plan and addresses any identified deficiencies. Information regarding wastewater discharge is disclosed annually in the Environmental Information Disclosure Reports for each site, which are available at:
		Environmental Information Disclosure of Huli Aluminum Foil Factory 2024: https://www.xiashun.com/public/attachment/images/20250325/5897
		2a8cab07lb0039ac570ae79615d4.pdf Environmental Information Disclosure of Haicang Aluminum Foil Plant
		2024: https://www.xiashun.com/public/attachment/images/20250417/7a475 738d3826e7b3c1b2b88366b1bd5.pdf

CRITERION	RATING	COMMENT
		Environmental Information Disclosure of Dongfu Strip Plant 2024: https://www.xiashun.com/public/attachment/images/20250324/45fc7 203ea5992257clefcad234fdc34.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a procedure to assess and manage risks related to Spills and Leakages of pollutants, supported by appropriate emergency response actions and plans. Regular inspections are conducted to detect potential sources of Spills or Leakages. The emergency response and prevention management plans are updated and improved in response to changes that may affect risk levels or if control weaknesses are identified. The risk identification and emergency response plans disclosed in the Emergency Plan for Production Safety and Environmental Accidents, are available at: https://www.xiashun.com/public/attachment/images/20250424/03b8 8fff4f8la454d6fe0334ba38f0e4.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established procedures for reporting Spills through its emergency preparedness and action management procedure, as well as its communication management procedure. Relevant information is disclosed to affected parties in the event of a Spill or Leakage incident. Since 2020, there have been no reported Spills. Information on spill management and prevention is publicly disclosed in the 2024 Sustainability Report, page 10: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6edlfdb5037e0812481ld6.pdf
6.5a-c Waste Management and Reporting	Conformance	Waste management is integrated into the Entity's Environmental Management System, guided by a Waste Mitigation Hierarchy. The Entity prioritises waste reduction through re-use and recycling strategies, effectively decreasing the amount of waste generated, particularly Hazardous Waste, per unit of product. Hazardous Waste disposal complies with all applicable legal requirements. The quantities of Hazardous and Non-Hazardous Waste generated from its activities for 2024 are disclosed annually in the Environmental Information Disclosure Reports for each site, which are available at: Environmental Information Disclosure of Huli Aluminum Foil Factory 2024: https://www.xiashun.com/public/attachment/images/20250325/5897 Environmental Information Disclosure of Haicang Aluminum Foil Plant 2024: https://www.xiashun.com/public/attachment/images/20250417/7a475738d3826e7b3clb2b88366blbd5.pdf Environmental Information Disclosure of Dongfu Strip Plant 2024: https://www.xiashun.com/public/attachment/images/20250324/45fc7203ea5992257clefcad234fdc34.pdf
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.

CRITERION	RATING	COMMENT
6.8a-d Dross	Conformance	The Entity has established a management process to optimise the collection and utilisation of Aluminium Dross, aiming to reduce the Aluminium content in the Dross and maximise resource efficiency. Periodic reviews are conducted to monitor Aluminium content and ensure effective collection processes. Aluminium Dross generated during production is transferred to government-approved Hazardous Waste disposal companies for resource recycling, where it is processed into building materials, purifying agents, and other products. The Entity conducts annual on-site inspections of the recycling companies to ensure the Dross is not being landfilled. To further reduce the Aluminium content in unprocessed Dross, the Entity has developed a plan to enhance the utilisation of raw materials and support sustainable practices.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity measures and documents its water intake and usage based on the source and type of water in the environmental impact and water resource risk assessments. The Entity has evaluated the water-related risks, considering the local water environment, water intake and discharge, and the effectiveness of existing management measures. The Entity's water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence. The Entity has prepared a risk assessment report and an annual water consumption report, both available at: Water Resources Risk Assessment Report: https://www.xiashun.com/public/attachment/images/20250425/22926f2f4bel956eb08l5790ff2ae3ec.pdf Annual water consumption report 2024: https://www.xiashun.com/public/attachment/images/20250421/e179dcae5fc4d5f82f9lcadba357b44f.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no significant water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has engaged a qualified Third Party to conduct an Environmental Impact Assessment (EIA), including an evaluation of Biodiversity and Ecosystem Services, which was approved by the local Environmental Protection Agency (EPA). The Environmental Impact Assessment and Biodiversity risk assessment confirmed that there are no sensitive Biodiversity areas within the Entity's influence. The Entity is located within a Government planned industrial zone with its own functional Environmental Management System and therefore the environmental risk level is considered low. The Biodiversity, Ecosystem Services And Alien Species Risk Assessment Report is available at: https://www.xiashun.com/public/attachment/images/20250428/73f4f8f84b8fe7lb9fdc6dl3d421ff56.pdf
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified have been assessed and documented as low risk according to the approved Environmental Impact Assessment. No

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		Priority Ecosystem Services have been identified as a result of this assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no significant risks and impacts on Biodiversity within the Entity's Area of Influence.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no significant risks or impacts to Biodiversity within its Area of Influence, and no priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has implemented a management policy, and procedures designed to prevent the introduction of invasive species. Any potential risks associated with the introduction of such species through its operations and logistics activities have been identified. An assessment has been conducted to determine if these activities could significantly impact Biodiversity features and Ecosystem Services. According to the outcomes of the Biodiversity Assessment, the risk of the Entity's activities introducing invasive species is considered extremely low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed not to explore or develop New Projects or make Major Changes in World Heritage Properties as documented in the management manual. There are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has committed to protecting the environment as documented in the management manual. According to the Environmental Impact Assessment Report approved by the local EPA, there are no Protected Areas within 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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The ASI Social/Environmental Governance Policy includes a commitment to respect Human Rights, including gender-responsive policies, available at: at: https://www.xiashun.com/public/attachment/images/20250115/9ccfbaa7e09e0d489118b369816275bb.pdf
		The Entity has identified potentially Affected Populations and Organisations and has established a Human Rights Due Diligence process.
		The Entity has informed potentially Affected Populations and Organisations of the Complaints Resolution Mechanism. After consultation, the Entity has identified and assessed the potential significant Human Rights impacts. Due to the Entity's size and the nature of its operations, it is determined that there are no significant impacts to Human Rights.
		No negative information regarding Human Rights violations has been identified online, and no complaints from the populations and organisations have been received.

CRITERION	RATING	COMMENT
		The policies and Due Diligence process are assessed during annual internal audits and reviewed during the annual management review meeting.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity respects women's rights and interests. The percentage of women working in managerial roles is currently greater than that of female Workers throughout the Entity. The Entity has identified legal rights for women and implemented control measures to ensure these rights are upheld. No complaints have been received from female Workers. Policies and control measures are reviewed at the annual management review meeting. The effectiveness of the measures taken to promote gender equity is publicly disclosed in the Social Responsibility Report 2024, page 2: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6edlfdb5037e0812481Id6.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in 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 to the Entity, as there are no Indigenous Peoples in 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 to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable as there are no sacred or cultural heritage sites or values within the Entity's Area of Influence, and the Entity is located within an Industrial Park.
		However, the Entity has established a procedure for protecting cultural and sacred heritage.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located in an Industrial Park and does not have any New Projects or Major Changes that require resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity commits to respecting the legal and customary rights and interests of Affected Populations and Organisations in their lands, livelihoods and use of natural resources. The Entity has identified the significant impacts, including health and safety, social and cultural Human Rights and environmental impacts resulting from its activities in consultation with potentially Affected Populations and Organisations.

CRITERION	RATING	COMMENT
		Due to its size and the nature of its operations, the only potential impact would likely be from any environmental incident. There are emergency response plans for environmental incidents at all three sites, and these plans have been communicated to the relevant interested parties.
		The Entity employs people from the Local Communities to respect and support their livelihoods.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The ASI Social/Environmental Governance Policy includes a commitment to not using conflict minerals and communicates this requirement to its supply chain. The ASI Social/Environmental Governance Policy is available at: https://www.xiashun.com/public/attachment/images/20250115/9ccfbaa7e09e0d489118b369816275bb.pdf The associated Management System has been established, including
		the assignment of responsibilities and authorities. The Entity requires its suppliers to sign a commitment letter to not use conflict minerals.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has mapped the mineral supply chain to identify the mineral sources and assess the risks in Conflict-Affected and High-Risk Areas. As per this mapping exercise, all mineral materials are not sourced from CAHRAs.
		The Entity has identified all their Aluminium node suppliers and confirmed all suppliers are ASI Certified. The Purchasing Department retains the ASI Certification certificates of Aluminium smelters as supporting evidence.
		The Entity conducts risk assessments and supplier audits for alloy suppliers. The audit results confirm that no mineral minerals are sourced from CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has designed a strategy to respond to identified risks, and the responsibility for decision-making has been defined, based on the OECD Due Diligence Guidance.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report	Conformance	The Entity reports annually on its supply chain Due Diligence in its annual Sustainability Report including the present CAHRAs status.
annually		The Entity has made related disclosures regarding supply chain Due Diligence and conflict-affected minerals in the Social Responsibility Report 202424, page 4: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6ed1fdb5037e08124811d6.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The local authority qualifies the outsourced security service provider. The agreement between the Entity and the service provider clearly defines security responsibilities and authorities, and associated training is provided to security guards. No complaints regarding security practices were received in 2024.

CRITERION	RATING	COMMENT
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the Entity complies with Applicable Law in China related to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has committed to respecting its employees' rights to Freedom of Association and Collective Bargaining. There is a Trade Union, and all Entity employees are union members. A Collective Bargaining Agreement for wages is in place for the period of 2024-2026. Worker representatives are empowered to convey Workers' concerns to management. According to the report on grievance handling, all investigations and actions taken in response to complaints or appeals from Workers involve the active participation of Worker
		representatives in relevant activities and processes.
10.2a Child Labour	Conformance	Child Labour (younger than 16 years old) is prohibited in China. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in Hazardous working conditions. There is no Child Labour or Young Workers at the Entity. The youngest employee hired in the Entity is over 18 years old.
10.3a-c Forced Labour	Conformance	The Entity has committed to complying with the prohibition of Forced Labour, Slavery, and Human Trafficking and expects its suppliers to comply with the prohibition of Forced Labour, Slavery and Human Trafficking. Relevant training courses on Forced Labour are provided to Workers, and there are no known or reported cases of Forced Labour.
		All employees are hired directly. Workers are not required to provide any form of deposit, recruitment fee, or equipment advance. No loans are provided to Workers, and no illegal deductions are made. There is no retention of original copies of Workers' documents, only copies are kept.
		There are no foreign Migrant Workers at the Entity, all Workers are Chinese. There is no restriction on the freedom of movement of Workers in the workplace and they can choose to terminate their employment within the required notice period.
		The Entity's annual Modern Slavery Statement is publicly disclosed at: https://www.xiashun.com/public/attachment/images/20250410/c183b98860b0b483e7646a4fc2302c49.pdf
10.4a-c Non-Discrimination	Conformance	Any form of Discrimination is banned, and decisions in hiring, during employment (such as compensation, promotion, access to training, etc.), or terminating Workers are based solely on the candidate's ability to perform the job's requirements rather than other personal characteristics. Training courses on non-Discrimination are provided to Workers to promote the culture of non-Discrimination, and there are communication channels for Workers to report cases of Discrimination. No cases of Discrimination have been received or found.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and Workers' representatives. The process to anonymously report grievances and complaints without threat of reprisal, intimidation or Violence and Harassment is established. All interviewed

CRITERION	RATING	COMMENT
		Workers understand how to lodge a complaint or report their concerns.
10.6a-g Violence and Harassment	Conformance	The Entity's policy of no Violence and no Harassment in the workplace is part of the ASI Social/Environmental Governance Policy, available at: https://www.xiashun.com/public/attachment/images/20250115/9ccfbaa7e09e0d489118b369816275bb.pdf
		The Entity's policy of no Violence and Harassment was established in consultation with Worker representatives and communicated to all Workers. All Workers are provided with the associated training.
		In accordance with ISO 45001 requirements, workplace Violence and Harassment hazards are identified, and associated risks are assessed in consideration of existing control measures. Worker's representatives engage in the identification and assessment process. The control measures are established and implemented.
		No complaint of Violence and/or Harassment in the workplace has been received in the past three years.
10.7a-c Remuneration	Conformance	All Workers sign employment contracts with the Entity within one month of starting their jobs. The terms and conditions of the contracts meet applicable legal requirements.
		Since April 1, 2025, the legal minimum wage has been CNY 2,265 per month, and this wage is guaranteed for all Workers. Although there is no formal living wage established for the region in which the Entity operates, the net income of all Workers meets their basic needs and allows for some discretionary income.
		In compliance with the legal requirement, the site pays Workers 150% of the regular wage for Overtime on working days, 200% for weekends, and 300% for public holidays. The Entity obtains the approval of the Comprehensive Working Hour System from the state authority, and the Workers in the approved area will get the compensation for the Overtime work on the working days and rest days as 150% of their regular wage.
		All employees in the Entity enrol the mandatory social insurance scheme.
		The wages are paid to Workers by bank transfer on the 12 th of the following month which meets the local legal requirement. All interviewed Workers confirm there is no delay for the wage payment since they joined the Entity.
10.8a-c Working Time	Minor Non- Conformance	A facial recognition attendance system is in place to ensure the accuracy of attendance records. The workshop operates on a four-group-three-shift rotation working system within an eight-day working cycle, Workers average six days of work and two days of rest. The workday does not exceed eight hours on average over six months.
		However, it was identified the annual working hours of two out of 315 randomly selected Workers exceeded the legal limit.
10.9a-b Informing Workers of Rights	Conformance	The Entity has established and implemented multiple mechanisms to inform Workers of their rights, including information boards and the Employee Manual which is approved by the Trade Union and distributed to all employees. The Entity periodically provides training on Freedom of Association and Collective Bargaining.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, and maintains an Occupational Health and Safety Management System (OH&S). which is certified to ISO 45001:2018. Through on-site observations, document reviews, and interviews with management and Workers, it has been determined that OH&S
		management and operational controls are effective. This demonstrates the system is effectively preventing workplace hazards, promoting a safe and healthy work environment, and complying with the appropriate regulations and standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity undertakes systematic reviews of its OH&S Management System. These reviews are conducted through a variety of methods, including monthly safety meetings, annual legal compliance assessments, ISO 45001:2018-based internal audits, and management reviews. The identification of control gaps is followed by a prompt analysis to implement corrective or preventive actions to ensure system effectiveness.
		To cultivate transparency, the Entity publicly discloses its OH&S objectives, 2024 targets, and comparative performance analyses with industry peers in the Social Responsibility Report, pages 6-7: https://www.xiashun.com/public/attachment/images/20250603/7564 18577c6ed1fdb5037e08124811d6.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has formed a Health & Safety Management Committee to oversee workplace Safety standards and drive continuous improvement in Health and Safety practices. Regular committee meetings assess current conditions and develop enhancement strategies. To encourage employee engagement and feedback, the Entity provides communication channels including suggestion boxes, Worker representative assemblies, and a WeChat application to enable employees to report concerns and contribute to resolving Health and Safety issues collaboratively.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 July 2019	Initial Certification Audit – Full Certification
1	29 October 2021	Surveillance Audit; Certification Scope revised to update the products and processes and shorten the description of the site locations; Revised the processes listed in the Audit Scope description for the Initial Certification Audit.
2	26 July 2022	Re-Certification Audit – Full Certification Certification Scope updated to more accurately represent the Entity's products and processes.
3	4 July 2024	Surveillance Audit
4	18 June 2025	Re-Certification Audit and Scope Change to apply Performance Standard V3.1.